

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE COMPLAINT FILED
BY WWC LICENSE LLC AGAINST GOLDEN
WEST TELECOMMUNICATIONS COOPERATIVE,
INC., VIVIAN TELEPHONE COMPANY, SIOUX
VALLEY TELEPHONE COMPANY, UNION TELEPHONE
COMPANY, ARMOUR INDEPENDENT TELEPHONE
COMPANY, BRIDGEWATER-CANISTOTA INDEPENDENT
TELEPHONE COMPANY AND KADOKA TELEPHONE
COMPANY REGARDING INTERCARRIER BILLINGS

CT05-001

Transcript of Proceedings

Volume 6

August 7, 2006

BEFORE THE PUC COMMISSION

Chairman Robert Sahr
Vice-Chair Dusty Johnson
Commissioner Gary Hanson

COMMISSION STAFF

John Smith
Rolayne Wiest
Harlan Best
Greg Rislov

ORIGINAL

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9 I N D E X

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1 MONDAY, AUGUST 7, 2006

2 VICE-CHAIR JOHNSON: Good morning. This is August
3 8th, the State Capitol in Pierre. This is the date and time
4 for reconvening the hearing on CT05-001. I'm Dusty Johnson,
5 the vice-chairman of the commission. Appearing with me here
6 today is Gary Hanson. John Smith is acting as the hearing
7 officer, hearing examiner for this particular docketed item.
8 At this point we will turn it over to Mr. Smith.

9 MR. SMITH: Thank you, Mr. Chairman. Are there any
10 preliminary matters the parties wish to address before we begin
11 the evidentiary continuation of the hearing?

12 MR. WIECZOREK: Mr. Smith, the only preliminary matter
13 is I'm not sure procedurally where the motion was to allow a
14 substituted exhibit. It was a one-to-one vote you might
15 recall, and I'm not inclined to argue it again today, but I'm
16 not sure if the commission doesn't want to render a vote on
17 that today to resolve where that -- whether that's a pending
18 motion or whether that motion has been decided one way or the
19 other.

20 MR. SMITH: I think it has not been decided one way or
21 another and I will tell you my belief is although the
22 commissioners did not make a formal motion to defer action on
23 it because we were missing one commissioner, and we are missing
24 one today, I'm maybe inclined -- do you intend to make
25 reference to that exhibit today?

1 MR. WIECZOREK: I do not.

2 MR. SMITH: If we are not going to reference the
3 exhibit today, could we address that with the benefit of the
4 full briefing on the case that we are going to have probably at
5 the conclusion of the evidence?

6 MR. WIECZOREK: I wouldn't have an objection to doing
7 that. As I made clear in my motion and I think a couple other
8 times, that I believe this is something I could have briefed
9 without even asking for a substituted motion, could have
10 briefed the mistake of the calculation, so I wouldn't have any
11 objection to briefing it as part of the post hearing briefs.

12 MR. SMITH: Right, and one suggestion, because the
13 motion was a motion to present an exhibit which, if I
14 understand your argument correctly, it was a motion to conform
15 the exhibit to the contract as written in the view of Western
16 Wireless or Alltel now.

17 MR. WIECZOREK: That's correct.

18 MR. SMITH: And yet there does remain at least some
19 argument concerning the construction of that provision and I
20 recall one of the suggestions as well was that both the
21 original exhibit, which supports -- which presents the
22 numerical conclusions from one interpretation of the contract
23 and your substituted exhibit would present the numerical
24 computations resulting from the other potential construction of
25 the contract. We also discussed whether or not it might make

1 sense to have both exhibits in the record so that depending --
2 ultimately the construction of that contract is for the
3 commission and then the court after that, if it goes there.

4 And might it not make sense to have both exhibits in
5 the transcript so that depending upon how the commission and
6 ultimately the court rules on the interpretation of the
7 contract, at least they have got the computational data that
8 they can rely on then to calculate the results of the case? At
9 least I recall we discussed that, and as I recall, Western
10 Wireless had no objection to that, but again, I think that's
11 probably something we can address after we have concluded the
12 evidence and have moved on to what do we do now phase. Maybe
13 because we are settling the factual record, we should deal with
14 that first.

15 MR. COIT: I've got a response to that. It seems to
16 me is whether that substituted exhibit is going to be part of
17 the factual record -- we object to the inclusion of that
18 substituted exhibit as a factual record because it's our belief
19 that what they are effectively trying to do by putting that in
20 is raise an issue, a new issue, an issue that they are trying
21 to present at the end of the case regarding a new
22 interpretation of the contract that was not argued at all in
23 the previous proceedings. And for that reason, we strongly
24 object to the inclusion of the substituted exhibit.

25 MR. SMITH: Other responses.

1 MS. ROGERS: I concur with Mr. Coit's comments. I
2 think the other thing that we pointed out in our resistance to
3 the motion is not only is this bringing forward a new
4 interpretation and a new factual issue that was not presented
5 during the hearing, but the substitution or the attempted
6 substitution of the exhibit is contrary to the very evidence
7 that they presented during the hearing, and so it seems to me
8 like it becomes a very confusing issue of are you going to
9 allow it or are you not going to allow it, because it really
10 does contradict the testimony of their witness at the hearing.
11 I don't think that the exhibit should be substituted and I
12 don't think that it should be allowed and for all the other
13 reasons that we stated at the motions hearing.

14 MR. COIT: One more comment, too. If the exhibit is
15 permitted, then I guess we would reserve the right to present
16 some additional testimony from Mr. Thompson; is that correct,
17 Ms. Rogers?

18 MS. ROGERS: Yes.

19 MR. SMITH: Could I hear from staff first and then we
20 will go back and listen to a response?

21 MS. WIEST: Staff's position hasn't changed. We
22 didn't object to them correcting the exhibit to begin with.

23 MR. SMITH: Would staff feel that it's more advisable
24 to correct the exhibit where then we will have an exhibit that
25 is different than the one we originally had in the case, or to

1 have it -- if it is allowed in the case at all, to be admitted
2 as an additional exhibit that just presents a mathematical
3 explanation of a different, of an alternative interpretation of
4 that provision of the appendix?

5 MS. WIEST: I'm not sure if it matters much which way
6 you do it at that point.

7 MR. SMITH: Well, let me ask you this. If the
8 commission were to decide that the interpretation of the
9 contract that formed the basis for the original exhibit is the
10 proper interpretation of the contract, and if the commission
11 were to decide that that's the interpretation of the contract
12 that was in fact supported by Mr. Williams's testimony, might
13 it not be useful for the commission to have an exhibit that
14 reflects the way that particular interpretation of the contract
15 affects the monetary outcomes in the case, so that we have an
16 exhibit that supports what we might decide is the way we want
17 the case to go?

18 MS. WIEST: Yes, I would see his point with respect to
19 that.

20 MR. SMITH: Mr. Wieczorek.

21 MR. WIECZOREK: As I said, it wasn't my intent to
22 reargue this. It was more to clear the record as to where that
23 was. I understand that the other side has a waiver argument,
24 that Mr. Williams said here is my exhibit and here is how I
25 calculated it. And the only way that -- if the contract is

1 clear on its face that there is a mistake in calculations is
2 the only way that I would see that this commission could say,
3 oh, yeah, the testimony was screwed up, the contract is clear
4 that it's screwed up, then I think the commission as a matter
5 of law says, no, the contract says this, I don't care what the
6 testimony says, it's on the contract.

7 Now, I've been consistent in saying I think I can
8 brief that if the testimony is contrary to the contract. I
9 understand they have what they are asserting as a waiver
10 argument, that you presented the calculation originally like
11 this and you can't now change your calculation. So frankly,
12 given that the only way I think -- given that I think the way
13 the commission would resolve this is to say, okay, Mr.
14 Williams, you testified A, but the contract clearly says B,
15 that's where the commission then would land on that second
16 calculation.

17 So I'm not taking the position that I actually think,
18 Mr. Smith, you having it as separately marked might be
19 beneficial, but frankly, I think I can brief it without putting
20 any testimony on to say if you look at this contract, the
21 contract actually provides clearly for this -- the calculation
22 being screwed up, as a matter of law, not relying on any facts.

23 MR. SMITH: It's an odd situation we are in because I
24 agree with you, interpretation of a contract is -- those are
25 questions of law. I think South Dakota case law is clear. The

1 oddity we have in this case, of course we have a whole bunch
2 of -- in terms of foundational and explanatory testimony of an
3 exhibit, which really effectively operated as a lot of parol
4 evidence regarding the contract, and that went in obviously
5 without objection because it was your own evidence and so we
6 just have an unusual situation here.

7 MR. WIECZOREK: It is, and I apologize for putting it
8 in or for probably not catching it, where clearly the contract
9 I think says something different than what our first exhibit
10 provides for. I brought it up early on because I thought,
11 well, I have to reserve this right to potentially brief it if
12 the calculations are wrong, and frankly, I'm in a position
13 where this hearing -- I started this hearing, if you might
14 recall, sick. Now Commissioner Hanson comes in with a broken
15 foot at the end of the hearing. Before anybody else is
16 injured, I don't want to take any more evidence. I think it's
17 a -- it's kind of an -- I think it's a question of law and the
18 only way I can win that is a question of law, is for you to
19 say, no, the contract provides clearly for A and that's how the
20 calculation has to be done.

21 MR. COIT: Just a brief response. I guess in addition
22 to the waiver argument that Mr. Wieczorek mentioned, it seems
23 to me that there's also a due process argument. When we
24 decided to continue the hearing or when the decision was made
25 to continue the hearing, it was for one purpose, and between

1 the time that obviously we adjourned last time and today, they
2 discovered a new issue. That's what this is about. They have
3 discovered a new contractual issue and they are taking
4 advantage of the fact that the record was left open to permit
5 them to present some additional rebuttal testimony, and they
6 are taking advantage of that to put in another issue.

7 And for him to sit and argue that this is a clear
8 interpretation of the contract, I don't agree with that at all.
9 What they are trying to do is if you go to section 4.0 in the
10 appendix, they are trying to say that when you look at the
11 reciprocal compensation credit for local traffic, that you not
12 only look at local traffic for Western Wireless that's
13 terminated to them, but you look at toll traffic, which in
14 itself is ridiculous. Under the law, there is no right to
15 recip comp charges on toll traffic.

16 MR. SMITH: Well, I think maybe what we will do on
17 this, maybe just to wrap up this phase of things here, though,
18 would you not agree, though, Rich, that the interpretation of
19 the four walls of that contract is in fact an issue of law,
20 under South Dakota law?

21 MR. COIT: I'm sure it is, but why didn't they bring
22 it up early in the case? Why do they have the right to bring
23 this up now? Why didn't they bring it up when the contracts
24 were first negotiated three or four years ago? They are
25 bringing up another issue now in a contract at the end of this

1 proceeding after it was reopened for one specific purpose.

2 That's the complaint that we have with the process.

3 MR. SMITH: Well, in terms of factual evidence in the
4 record, wouldn't you agree that all of the factual evidence
5 that we have actually supports your interpretation of the
6 contract that we have in there thus far?

7 MR. COIT: Yes, because they agreed early on that
8 there was no issue with respect to the actual terminated
9 minutes of use.

10 MR. SMITH: Okay, thank you. What I'm going to
11 recommend is that I'm assuming we are not going to be done by
12 noon I don't think, and what I'm going to recommend is that we
13 consider this issue before the close of the hearing today, but
14 either at the end of the hearing or maybe right after lunch,
15 and how is that? So we have a chance to get our thoughts
16 together on this as to what the best course of action is. Is
17 that okay with everybody?

18 I would appreciate it if all three commissioners were
19 present when we voted on this, but -- when they voted on this,
20 but they are not, and I think we do need to at some point
21 settle the record here so we can move along with briefing, and
22 if we can -- assuming we can get a vote with two present, we
23 may do that. I think with that, Mr. Wieczorek, we will proceed
24 with your rebuttal witness. So please proceed.

25 MR. WIECZOREK: All right. WWC License LLC would call

1 Joe Oliver to the stand, please.

2 Thereupon,

3 JOE OLIVER,

4 called as a witness, being first duly sworn as hereinafter
5 certified, testified as follows:

6 DIRECT EXAMINATION

7 BY MR. WIECZOREK:

8 Q. Just for the commission, could you state your full
9 name?

10 A. Certainly. Joe Oliver.

11 Q. And where are you from, Joe?

12 A. I work in Wilkes-Barre, Pennsylvania. I live in
13 northeast Pennsylvania and I work for Alltel.

14 Q. Have you ever testified before?

15 A. No, I have not.

16 Q. Just due to the peculiarities of the room, make sure
17 the mike is close because I assume this is on Web broadcast.

18 A. Okay.

19 Q. You said you work for Alltel. What is your current
20 job position with Alltel?

21 A. I'm a senior applications developer, and I work in the
22 message processing system.

23 Q. What does --

24 A. What does that mean?

25 Q. What does that mean?

1 A. I'm one of three people that are responsible for the
2 flow and processing of CDR, call detail records, and AMA
3 records that go into our billing system, so I support the
4 product that translates the records that come from the switch
5 and pass them into the billing system.

6 Q. How long have you worked for Alltel?

7 A. I've been there for 15 years.

8 Q. And what have you done historically for Alltel?

9 A. For the first five years the company was actually
10 called Systematics, it was solely owned by Alltel and
11 Systematics was the IT division of Alltel, and we did all the
12 billing software for Alltel, but we also did billing, cellular
13 wireless billing software for other companies. So during that
14 first period of time, let's say the first five years of my
15 career working with the call detail records, we supported a
16 billing product that was used by Frontier Cellular, Bell South,
17 and we were in the process of turning it on for all of GTE at
18 the time GTE and Bell Atlantic merged and it never actually
19 went to production, so I have experienced it with three other
20 clients. And then after, say, the first five years
21 Systematics was changed to just be more of an integral part and
22 we worked under the name of Alltel and since that time all of
23 the data processing has been focused just on the Alltel
24 wireless business.

25 Q. Has part of your job been the integration of

1 acquisition of additional cell companies that Alltel has made?

2 A. I've worked on actually every conversion that Alltel
3 has done since I started working for the company and Alltel has
4 been quite busy over the years purchasing other smaller
5 wireless companies. CenturyTel, MobileTel come to mind are
6 some of our acquisitions. In the last year or two we have
7 purchased selected properties from Cingular and US Cellular as
8 part of purchase and arrangements with balancing out our
9 coverage area across the the country.

10 Q. When you say conversion, what do you mean?

11 A. What happens when we purchase another company is that
12 they bill all of their subscribers out of their own billing
13 system, maybe internal or from a third-party billing system,
14 and when we convert them over, we bring them in so they are
15 part of the billing system that I support, which we call V-II,
16 Virtuoso-II, I may refer to that as V-II. That's the name we
17 use for our Alltel internal billing system for wireless calls.

18 Q. Did you have any -- did you participate in bringing
19 Western Wireless's switches into your system?

20 A. Yes, I was the main person that worked on the
21 conversion for the CDR processing piece of the Western Wireless
22 conversion. I traveled to Bellevue, I met my counterparts at
23 Western Wireless, and converting over to a new billing system
24 is actually pretty complicated because you have multiple
25 billing cycles and it has to be transparent to the subscriber,

1 and being just the way the nature of wireless calling and the
2 way it overlaps, you have to work quite closely with the other
3 billing vendor to make sure that when you are doing your
4 iteratives and your mock and your testing period that the bills
5 match out perfectly before you make the cut and go forward,
6 because once you really make that cut, there's no going back.
7 It's very critical we get it right.

8 Q. I'm going to show you what I've had premarked as WWC
9 Exhibit 22, and I've got copies for everyone.

10 MR. SMITH: I want to note here, too, for everyone in
11 the room that because we are Webcasting this, that we don't
12 have a completely closed audience here and so if anything is
13 confidential information, you are going to have to note that
14 because then the chairman will take us off line in terms of the
15 Internet. Thank you.

16 Q. (BY MR. WIECZOREK) Mr. Oliver, can you explain to the
17 commission what WWC Exhibit 22 represents?

18 A. Sure. This is a flow of the process that we use in
19 collecting the call data records. Let me start with the
20 cellular switches in the upper left-hand corner. We have
21 switches of multiple manufacturers of course. Our switches are
22 made by Nortel and Lucent in the Western Wireless world. We
23 have Motorola in the Alltel world, and when transactions take
24 place through a switch, in order for the billing system to bill
25 that transaction properly, the information that's necessary for

1 billing gets written to what's called a CDR record, and I
2 believe also as in the other testimony, CDR, AMA record, it's
3 all the same thing. Those CDRs are pulled by a call collector,
4 which is in the bottom left-hand corner of this exhibit, and
5 the call collector is in constant communication link to the
6 switch and its job is to store and collect and bring these
7 records into this buffer area. It's a server, its purpose is
8 to collect, store and then to transmit to the billing system.
9 Twice a day a batch of these calls from the switches that are
10 collected, like a 12-hour period, get transmitted over secure
11 transmission lines to the mainframe computer. In our case we
12 use an IBM mainframe, and they are transmitted to the raw AMA
13 records.

14 Q. That's where you are pointing at where it says raw AMA
15 records.

16 A. Yes.

17 Q. What's the difference between raw AMA records and just
18 CDRs?

19 A. Again, the term AMA record and CDR can be used
20 interchangeably. I don't believe there is a difference between
21 the two. I believe it's just two terms for the same thing,
22 perhaps one is more generic, it's across the industry, and one
23 is more switch related. But the AMA record that we receive
24 after that transmission is in the exact same format as it comes
25 off the cellular switch, but there is no modification in this

1 picture between the cellular switch and the block that's named
2 raw AMA records.

3 Q. When you receive these raw records, this is part of
4 your standard system, in your -- in your standard approach or
5 how it works at Alltel, before we get into it, did Western
6 Wireless handle their CDRs or AMA records the same way Alltel
7 handles them?

8 A. They had different manufacturers, but the process was
9 the same. The data would be pulled from the switch, it would
10 be collected and it was transmitted, in their case they used
11 AMDOCS for a billing vendor and in my case at Alltel we used an
12 internal billing system.

13 Q. What's the name of that internal billing system?

14 A. V-II or Virtuoso- II is the name we use.

15 Q. We are up to the stage here where it says raw AMA
16 records. Has it hit your billing system yet at that point?

17 A. What happens is the file that contains these raw AMA
18 records gets transmitted and it hits the IBM mainframe and when
19 the transmission is complete, it catalogs a file and this file
20 contains 12 hours of CDR traffic and it's a flat file, it's a
21 batch of data, and as a general rule, we get about a million
22 records per switch per day.

23 Q. You used the term flat file. Could you explain to the
24 commission what a flat file is?

25 A. Sure. A flat file in the data processing world is

1 just a fixed length record, positions are in various locations
2 based on the type of record that you have, and to process a
3 flat file, you read them one record at a time. It's a file
4 that comes across as a transmission and the program that would
5 read that would be you read the first record, you read the
6 second record, you read the third record. It's not the type of
7 file that you would use like, say, for your customer accounting
8 system where you could go in and say, call a record for this
9 mobile number and just have those pop up on the screen. We
10 process it as -- it is not a relational database, it's a flat
11 file.

12 Q. You used the term relational database. What's a
13 relational database?

14 A. We use a lot of relational databases in our V-II
15 product, but the areas where we use relational databases is on
16 the client server side of our product. Let me make a
17 distinction here, client server, relational database, batch and
18 mainframe processing, if I can do a second to split on that.

19 Q. Sure.

20 A. The way our system is designed is if you were to go
21 into a kiosk to sign up for a phone server, so you go into the
22 Internet to key in your phone number to see what your account
23 balance is. All of that type of activity is set up in
24 relational databases because the files are out there and they
25 are keyed, usually multiple keys, so you can go into huge

1 volumes of data and select records that meet specific keys and
2 criteria and pop it up onto a screen so it's displayed. I
3 guess that technology, relational database is kind of key to
4 having an online portion of your billing system in today's
5 world where you need terminal access or a screen full of data
6 is displayed at a time. But that's really -- that part of our
7 business, that part of our software product is done on
8 Unix-based servers usually written in C language.

9 Now, there's another piece of our business that is
10 totally separate from that and that's the usage processing
11 piece. With the usage processing piece, there are
12 transmissions of batch files, flat files, if you will, and they
13 go into the IBM mainframe computer and we have programs that
14 are written in COBOL, which you probably didn't think they use
15 COBOL in business anymore. There's a lot of COBOL in business
16 and COBOL is the programming language that we use to read these
17 flat files, these batches of data that contain the CDRs.

18 Q. On your diagram it shows that after you get the raw
19 AMA, it goes to something called ReforMaster; is that correct?

20 A. Yes, ReforMaster is the name of the product within
21 Virtuoso-II that I'm responsible for. There are three people
22 at Alltel that support the product called ReforMaster and
23 ReforMaster takes care of all CDR processing. After
24 ReforMaster, there is not another program that accesses a CDR
25 record. So basically the CDR goes into ReforMaster, which is

1 written in COBOL, there's about 250,000 lines of code, and the
2 product -- the record that comes out of ReforMaster that gets
3 passed to billing is in a different layout and at that point we
4 have selected the fields we want off the CDR and we have
5 eliminated records that are not eligible for billing.

6 Q. Approximately how many records do you eliminate?

7 A. You would probably be surprised to learn that on an
8 average batch of data, it differs between switches, but I would
9 say on the average we eliminate 60 percent of the CDRs as being
10 not billable and the reason that it's so high is we get a lot
11 of CDRs that are, for example, incoming, incomplete calls.
12 Your phone is ringing but it's in the car right now. We get a
13 CDR for that transaction. We could find out how long the phone
14 rang and all that information, but as far as its value to the
15 billing purpose, it's just a record we drop.

16 Q. Do you drop other kinds of records, then, too?

17 A. Yes, certainly. A lot of our switches, a lot of
18 cities we have two switches and the database of which
19 subscribers belong to that switch will be split between these
20 two switches. For example, in Little Rock we have two switches
21 and the customer database is split between the two. When a
22 call comes in that goes to switch A because that's where the
23 database is, but then the cell site it goes to connect that
24 subscriber to may be connected to switch B. So what happens is
25 on the CDR level, we get a tandem land-to-land record that goes

1 from switch A to switch B to pass to HLR over to the secondary
2 switch and then we get a land-to-mobile record to the
3 subscriber that occurs on the second switch. So there's two
4 CDRs for that transaction and my process makes sure that we
5 only bill it to the subscriber as a single incoming call. We
6 don't bill him for the tandem call that connects the two
7 switches together.

8 Q. In preparing for your testimony today, did you review
9 the testimony from the previous days of the hearing?

10 A. Yes, I did.

11 Q. And you understand that re -- excuse me, Western
12 Wireless did not use ReforMaster, they used AMDOCS.

13 A. That's correct.

14 Q. How similar are AMDOCS and ReforMaster?

15 A. They do the same process because if you were -- like
16 say when we were doing our billing comparisons with Western
17 Wireless, given the same input CDRs, we would modify our
18 process until the logic behind it would give the same results
19 so that the billed images were exactly the same. They process
20 records in batch just like we do. The CDRs go into AMDOCS and
21 they eliminate the same records, they keep the same fields.
22 Now, as far as where they populate those fields on different
23 records, that of course is proprietary to AMDOCS, but the final
24 result would be the same.

25 Q. It basically is the same kind of software, just one

1 was proprietary and one is a third-party software?

2 A. Right.

3 Q. But they operate in the same what you call batch mode?

4 A. Yes.

5 Q. They use flat files?

6 A. Yes.

7 Q. In the testimony of Mr. Musick, he refers to that this
8 would be easy to produce these CDRs because all you have to do
9 is search a relational database. Do you recall that testimony?

10 A. Yes, I do.

11 Q. Is there a relational database or was there a
12 relational database at Western Wireless that you could just
13 search to pull out the information to do an interMTA study?

14 A. Not to my knowledge.

15 Q. And is there one at Alltel now?

16 A. There is not one at Alltel. We have never had a
17 relational database to analyze CDR records.

18 Q. Do you know of any wireless company that you have ever
19 worked with or -- I am assuming you talk sometimes to other
20 people working at other wireless companies.

21 A. Yes.

22 Q. Have you ever heard of any wireless company having a
23 relational database that allowed them to search CDRs?

24 A. No, I haven't. I think a lot of it is because you
25 deal with such high volumes of CDRs and the way our process is

1 set up, we want to read a CDR once and be done with it. In our
2 current world with Alltel, we read a record once, the CDR
3 record once and then that's it. It's not the type of database
4 that you would go in to query. When we get help desks that are
5 open to investigate a person's bill, a typical example would be
6 I didn't make this phone call. We have to go back and we pull
7 that call record, but at five, six, seven questions a week,
8 it's not -- it would never justify taking these millions of
9 records, in our case 128 million records a day, and loading it
10 into a database that would contain however far back these
11 complaints might come from.

12 Q. I'm going to show you what was marked as Golden West
13 47, which was Mr. Musick's diagram. On that diagram, he shows
14 that the CDRs go into the preprocessor. Is that what you
15 understand that he referred to as probably the AMDOCS type
16 system at that point?

17 A. Yes, that's correct.

18 Q. And then it goes to a call detail database.

19 A. I would disagree with that. I've never seen a case
20 where the raw AMA records would be put into a database.

21 Q. In his testimony, he said that the search would be
22 easy because that was a relational database. Is such a data --
23 did such a database exist for Western Wireless?

24 A. No, it did not.

25 Q. Did such a database exist for Alltel?

1 A. No, we did not have a call detail database.

2 Q. You said you guys, Alltel used to do processing in the
3 CDRs for Frontier Cellular. Where was that out of?

4 A. They were out of Rochester, New York.

5 Q. Was it a pretty good-sized cell company?

6 A. Uh-huh, yeah, it was a regional operator up there.

7 Q. And they didn't keep a relational database?

8 A. No. They used our billing system, there was no
9 relational database.

10 Q. And --

11 A. In fact I never heard anybody even ask for a
12 relational database. It's not the type of data that would
13 require it.

14 Q. Because you don't need to have a relation -- is it
15 true that wireless companies don't need a relational database
16 to do their billing?

17 A. Well, as I said earlier, we use relational databases
18 on cases where you need to go in to find information about the
19 subscriber base. That's an application where there's a fixed
20 size. You would set your computer up to say, I need to hold
21 all the information for my customers because I'm going to need
22 to be able to call up information on my customers based on his
23 zip code and phone number and his name, for the customer
24 service operators. But we don't have a business need where we
25 would want to load CDR records. So the files are so large and

1 they take so long to process, that like I said, we would read
2 it once, we store it and then we write it off the tape.

3 Q. After it's gone through this process of going through
4 ReforMaster or in Western Wireless's case going through AMDOCS,
5 would the CDRs be in a changed format that wouldn't even be
6 searchable to do this study?

7 A. Well, we always keep the CDR records when we store
8 them for backup in the original format that they came across.

9 Q. Okay. There was some testimony on that. What was
10 your understanding of how long Western Wireless kept backups on
11 their CDRs?

12 A. Actually, I know that because in preparation for this
13 hearing, I contacted the person that was in charge of that to
14 ask him how long they kept CDRs for historical research
15 purposes, and their answer was 90 days.

16 Q. But these are in batch file formats when they are
17 kept?

18 A. Yes.

19 Q. So they are nonprocessed, they are raw records?

20 A. That's right. If you need to find a specific record,
21 you simply need to know the switch and the date that the call
22 record occurred and go into the backup to restore where that
23 file, where that call record occurred to pull it back.

24 Q. That's to find a specific call. Can you do a general
25 search, just enter search terms to find information on it?

1 A. No, you would need to know like which actual file it
2 was in. It's not like you would take all of your data for
3 these 90 days and put it into one really, really big file
4 because to find the record that you need, you would have to
5 start at the top and you would have to read through millions
6 and millions of records. So we store it by the date, like we
7 put the actual date on the file name and it also has the switch
8 on the actual file name. So as long as I can identify what
9 switch and what date the call is recorded on, I am able to go
10 in and find the file.

11 Q. That's to find a specific call?

12 A. That's what almost all of our research work is, to
13 find a specific call.

14 Q. But to do this interMTA search, you couldn't do that
15 just by plugging in a couple commands against this raw data?

16 A. No, you would have to go back and restore multiple
17 days and process multiple records.

18 Q. You would have to do -- you would have to write
19 programs to process the records?

20 A. More than one program because the records are in
21 different formats. Lucent and Nortel are totally different.

22 Q. So let's go back to this Alltel -- excuse me, Western
23 kept their records for 90 days.

24 A. Correct.

25 Q. And so the testimony that Mr. Musick said that all

1 companies keep it at least a year, is that correct for what
2 Western Wireless was doing?

3 A. No, Western Wireless did not keep it for a year, they
4 kept theirs for 90 days.

5 Q. And they kept it in a raw format?

6 A. Yes.

7 Q. You said something about processing a batch, you have
8 to search line by line by line.

9 A. Well, one thing about batch files is that you read
10 them one record at a time. You read a program and say I am
11 looking for a specific criteria and the program would be
12 written just like programs that you may have had to write in a
13 college course, where you would read a record, does it meet the
14 criteria, yes or no, keep it or drop it. That's your basic
15 logic of filtering through large volumes of data.

16 Q. From reading the record, you understand that at one
17 point Western Wireless as part of this litigation produced
18 CDRs on these companies.

19 A. Yes, they did. It was difficult for them because they
20 used AMDOCS as a billing system, so in some ways it's easier
21 for me because our billing system is in-house, I have access, I
22 support the programs, I have access to the data, it's not
23 proprietary to the business. The business and the IT products
24 that I support are all under one roof.

25 Q. So do you understand from talking to people and

1 reading the record where Mr. Wilson had to pull the records at
2 on your chart?

3 A. Well, I believe what he did was that Western Wireless
4 had to begin collecting a duplicate feed of the data coming
5 from the call collector, because with AMDOCS, once it got into
6 the blocks marked ReforMaster, it was -- even though it's
7 Western Wireless data, it's being processed and stored by the
8 third-party vendor.

9 Q. And in doing that, I'm going to show you what was
10 marked as WWC Exhibit 16. That reflects the hours that Mr.
11 Wilson and different people entailed in pulling the CDRs for
12 these seven companies. I believe what's the total hours on
13 that?

14 A. 420 hours.

15 Q. Doing this duplicate feed and pulling these raw
16 switches and processing them down at least to NPA-NXX, do you
17 think that's a reasonable time frame?

18 A. Yeah, it took them a number of months, I think, to put
19 this all together, to begin the feed, and reading through the
20 e-mail chain, I think those hours are very reasonable.

21 Q. I want to go back quick to your display. You have
22 talked about a relational database dealing with customers. Is
23 that database a database you could actually search and do an
24 interMTA study off of?

25 A. No, because that database would not contain any usage.

1 When you get your cellular bill, you have the part of the bill
2 that says your name, your account, your opening balance, the
3 rate plan you are on. That data is searchable. But the page
4 that shows all the various calls and the dates and times that
5 your activity took place, that's not searchable. That's the
6 data that comes in from the CDRs.

7 Q. So that would be the data after being processed by
8 ReforMaster?

9 A. Right.

10 Q. Now, there was in the testimony of Mike Wilson concern
11 about modifying the AMDOCS system. Is there a concern about
12 modifying ReforMaster to kick out some of those reports?

13 A. I would never modify ReforMaster for any type of
14 study. And the reason is that these mainframe programs are
15 like the work horse of our billing product, and we try to make
16 them as stable as possible and when I need to make a change for
17 like a development effort or any time I need to actually change
18 the code in ReforMaster, I have to -- first I have to wait 12
19 days between the time I turn all of my test results over to QA
20 and there's a number of steps between peer review and parallel
21 testing that have to take place to make sure that you don't go
22 in and change a COBOL program that is bread and butter for the
23 company and make a mistake in it.

24 We have changes that are made as far as tables that
25 are read by ReforMaster. Like as they add cell sites, you

1 don't need to change code. As they add new free numbers that
2 can be dialed, you don't add code. That information goes in
3 external tables, but the actual code that does the processing
4 of CDRs, you wouldn't go in and stick a hook to pull
5 information out, not unless it was something -- it would have
6 to be a very strong business reason.

7 Q. There was also some testimony regarding the time line
8 to pull this data and the difficulty regarding pulling this
9 data and you might recall -- do you recall Mr. Wilson
10 testifying that local number portability slowed them down
11 somewhat in trying to figure out even how to do this study?

12 A. Well, it certainly slowed us down at Alltel. I
13 think -- being that was an industry mandate, you had no option
14 not to do local number portability and probably of anything
15 that hit the wireless industry in the last, I don't know,
16 forever, that was the most complicated enhancement we ever had
17 to do. It meant all the software and switches had to change
18 and it changed the way that we do our internal billing. People
19 think about -- you read about during Y2K all the mainframe
20 activities and how people are afraid the company was going to
21 stop that day. That was only adding two digits to the year.

22 Imagine suddenly if everybody got a new phone number
23 or imagine the processing changes across the United States if
24 the phone numbers went to 12 digits instead of 10. It was --
25 my friend and I used to joke at Alltel you are not just a

1 number, you are two numbers because you have your MIN and your
2 MDN that you have to keep track of. The number that you dial
3 is not the number that's owned by the company. So figuring out
4 the ownership of the calls uses one number, figuring out where
5 the call got routed and what displays on the bill, that's the
6 MDN and that's a totally different number. Modifying our
7 systems to get that right, that was a very big project.

8 Q. How long did that take?

9 A. We pretty much put all development on hold for the six
10 months that we were installing and testing that, because all
11 the CDRs also had to change because the additional information
12 had to be passed to us from Lucent and Nortel switches, and a
13 lot of the switch manufacturers had major problems with it,
14 too. In fact we still have some repercussions from it.

15 Q. Mr. Musick testified to do this interMTA study would
16 be easy based on -- essentially I understand his opinion to
17 rely on a relational database, which Alltel does not have,
18 correct?

19 A. Right.

20 Q. To do this or to do what Mike Wilson did, in your
21 opinion, is it easy?

22 A. Oh, no, it's not easy. I guess easy isn't a word that
23 gets used a lot by people that are doing the work.

24 Q. When you are pulling the switches or when you are
25 pulling the switch data, what kind of steps would you have to

1 do to even do this type of research?

2 A. You know, as in the testimony, you need to identify
3 like what switches and what dates, that's probably the easy
4 part. I think the more complicated part is when you look at
5 all these records, they come in many different types and
6 formats. For example, Nortel we have like maybe 200 different
7 rules that make one record look different from a different
8 record. And it could be anything from was it a call delivery
9 record, did it have call forwarding, was there other types of
10 features used. There's a lot of variety in the call records
11 that we process.

12 So figuring out which records are part of the study
13 and which records are not part of the study I think is probably
14 one of the more complicated pieces, getting all of that ironed
15 out. Because I would see a situation, say I would have a
16 question whether or not a certain type of call was to be
17 included in the study or not and have difficulty finding out
18 who is going to know the answer to that question because it's
19 sort of -- people have different backgrounds and that type of
20 question crosses skill levels of different people.

21 Q. Do you get multiple CDRs for one call sometimes?

22 A. For example, call forwarding is probably a great
23 example of that. When you have your phone set up for call
24 forwarding, that can generate an additional call. And again
25 this is a case where the two switches are different. If you

1 are talking a Nortel switch and you have a mobile-to-mobile
2 call, it comes on one CDR. But if you are talking on a Lucent
3 switch and you have a mobile-to-mobile call, it generates two
4 CDRs.

5 Q. And if you would have your mobile phone forwarded to
6 one of the Golden West numbers, would you get two CDRs on that?

7 A. Well, I think the big problem that I have with, say, a
8 call forwarded number going to a CDR, and I didn't see it in
9 any of the testimony, but my question on that would be how are
10 you going to know where the call originated. The information
11 isn't on the CDR, because as I understand it, you need to know
12 the MTA where the call originated and the number that the call
13 terminated at. And there is nothing on a call forwarded call
14 that's going to tell you what cell site the call originated on.

15 So if you were in a switch that covered multiple MTAs,
16 when we do our billing, we assume every call forwarded call
17 came out of the town where the actual switch was, because we
18 don't have a way to tell to any finer level of detail, and also
19 from a billing point of view, we don't really care. It's
20 not -- it hasn't been a problem that's come up. If you used
21 call forwarding, it's the same price if you were to forward it
22 out of the specific cell site or the default for the whole
23 switch.

24 Q. When you go through and you screen out your calls, do
25 you dump calls that weren't completed?

1 A. Well, sometimes we do and sometimes we don't. In the
2 landline side, if the call is not completed, you are not
3 charged for it, it doesn't show up on your bill, but it's
4 different in wireless. For example, if you are a foreign
5 roamer and you place a call on the Sioux Falls switch and the
6 person doesn't answer the call, we charge for that, we charge
7 for roamers for all incomplete calls and I believe that's
8 standard across the industry. If you are a home subscriber, we
9 are a little bit more lenient, but if the call is complete over
10 30 seconds long, it's a billable call.

11 Q. So those CDRs appear in the raw AMA records?

12 A. Right, and ReforMaster determines whether or not it's
13 kept or not, based on combinations like the duration and the
14 incomplete indicator.

15 Q. But even if you were to do this study based on the raw
16 records, those records would be there and you would have to
17 make a determination of whether those fall into this study or
18 not.

19 A. Well, I would want a clarification whether or not that
20 specific case needs to be included, and there's other cases
21 besides like incomplete and call forwarding. Can I give you
22 another example of one? These would be things I would need to
23 have ironed out. I think a lot of the ways -- the hardest part
24 of this process would be getting all of these exceptions ironed
25 out. An example would be when you dial 411 on your cell phone

1 for directory assistance, you get -- you tell them who you are
2 trying to call and then you stay on the line and the call is
3 connected. Well, to the subscriber you only made one call, but
4 on the record that comes back, it generates two CDRs. You have
5 the 411 CDR, which tells you the cell site where you were and
6 the duration of air time that you used, but now you also get
7 the call completion record that gets generated and that comes
8 in as a land-to-land record and it could have terminated at one
9 of the NPA-NXXs that are eligible for the study. But again,
10 that record doesn't tell me the cell site that it originated on
11 because it went from the third-party directory assistance call
12 completion service to that number.

13 I guess I'd have to ask -- I would want to ask
14 somebody, is that eligible for this study or isn't it. So I
15 would have quite a few questions on -- they may sound like
16 oddball cases, but you are talking thousands a day and over a
17 15-day study that's going to be extrapolated for a year, I
18 wouldn't want to make an error on judgment on that because all
19 these numbers add up to huge volumes.

20 Q. What kind of -- there was testimony where Mike Wilson
21 testified that they were having a hard time getting the
22 resources to even do the search on the raw CDRs. Is it
23 difficult to get the resource time on your mainframe to do this
24 type of work?

25 A. Well, on the mainframe, I work in the development

1 world and the problem that we always have on the mainframe is
2 it's one big computer and you have a set amount of space and
3 you have a set amount of CPU and obviously production comes
4 first, running your daily processes and getting your bills out,
5 like there always has to be enough space in CPU to do that.
6 There also has to be enough space in CPU available for the
7 development efforts that are taking place.

8 I don't know any shop where the people in development
9 aren't crying out for like I need more space and I need more
10 CPU, but it's expensive and you are always working within a
11 limitation of how much is available. Like for example, if I
12 was to kick off a job that was to read like all 15 days worth
13 of data at once from the sample, the people in the production
14 side would have my head because that would just be eating up so
15 much CPU that it would be holding down the production.

16 Perhaps it's a different concept than what we have in
17 the Unix server world where they go out and buy a new computer
18 and dedicate for a test environment. In the mainframe world
19 you don't go out and buy a separate mainframe for testing. You
20 just divide up it into different regions and it all comes from
21 a fixed pool of space and CPU time.

22 Q. Mainframes are quite a bit more expensive than just a
23 laptop?

24 A. Oh, yes.

25 Q. So what kind of steps would you have to run through

1 and do you understand that Mr. Wilson ran through to even
2 collect this data?

3 A. Well, I know Mr. Wilson was talking in his testimony
4 about having to go out and buy a special CDR analysis tool,
5 which I'm envisioning was a stand alone computer, and he didn't
6 have direct access to the historical data, so he had to build
7 an interface to intercept these CDRs on the way to the AMDOCS
8 billing system and load his server up with this data and then
9 had to develop the tools to work on the study from there.
10 That's a difficult process.

11 Q. From when Mr. Wilson originally proposed the analysis
12 in his e-mail of September 2004, they did a sampling of six
13 companies, they agreed on six companies in October to try to
14 pull the CDRs on. Do you recall that?

15 A. Yes.

16 Q. And he was able to produce some analysis on those six
17 companies within six months. Do you believe that was a
18 reasonable time frame?

19 A. Yes.

20 Q. Do you think you could do it in that time frame?

21 A. Well, I would like to think I could do it, shave a
22 month or two off it, but I may be overly confident in saying
23 that, too.

24 Q. Mr. Musick also testified that once you set up and do
25 this study, you just run it every time, and it's no really

1 extra time to rerun it every six months. Do you agree with
2 that?

3 A. I would be very -- I would be afraid to just run it
4 without going back to verify all your inputs are correct.

5 Q. When you say inputs, what do you mean?

6 A. Well, for one thing, the engineering side of the
7 house, we have cell sites being added. Like our network is
8 growing especially like seems lately at a very high rate, where
9 we add a lot of new cell sites. We are always tweaking the
10 cell sites in the directions that they point to get improved
11 coverage area and we add trunking arrangements, and when these
12 trunking arrangements and cell site changes are made, they
13 don't notify the billing people. I don't want to make it sound
14 like they are in two different worlds, but they are in two
15 different cities and they report up to different chains of
16 command and we don't have a communication link between the two
17 to pass that kind of information over to billing because in
18 today's world billing doesn't need to know that information.
19 We do need to know the addition of cell sites, but we don't
20 need to know trunking changes and modifications to existing
21 cell sites.

22 Q. When you are informed of an additional cell site, are
23 you given the MTA?

24 A. No. That's a piece of information that we have never
25 needed to know. In fact I was not aware of the term MTA until

1 I started reading the testimony on this hearing.

2 Q. And the intermachine trunking, do they let you know
3 what they are doing with intermachine trunking?

4 A. No. Again, that's like with the routing of the call.
5 We are concerned in billing with where the call originated
6 from, but as far as how it was routed out to the final
7 destination number, there is no billing impact with that change
8 and they make those changes all the time, they don't notify us.
9 So to do the study over again, your original question, I would
10 want to go back and verify that no changes have taken place.

11 Q. Additionally, wouldn't you have to collect all these
12 records and preprocess them even before you started matching
13 them to MTAs or tower sites?

14 A. Yes. You would want to filter out the calls that
15 don't apply to the study, just to get down to a workable size.

16 Q. And what would you have to do to collect 15 days of
17 records?

18 A. As I mentioned before, you wouldn't want to just bring
19 down 15 days worth of data and read it all. First of all, I
20 wouldn't have the space in my development area on the mainframe
21 for 15 days from four switches. So I would probably set up the
22 first program to be written would be the Nortel or the Lucent
23 preprocessor written specifically for this study and we would
24 probably process like, say, a day's worth of calls at a time
25 and that would filter out the records that don't apply and we

1 would eliminate the fields we don't need and get it down to a
2 shorter record of smaller volume and we would -- I would
3 collect those from, say, the multiple runs across the multiple
4 switches and the multiple days and then have all those files,
5 I'm thinking we would start like maybe, say, 15 to 30 million
6 records on the input, maybe one to two million records on the
7 output, although I'm not really privy to the ratio of what's
8 kept and what isn't in this study.

9 Q. If you had to do this type of study for, say, 25
10 companies in South Dakota and do it every six months, what
11 would that do to your staffing at your office?

12 A. That would give me a heart attack. Currently we only
13 have three people that support this entire ReforMaster product
14 and we handle all the production issues for 68 switches and we
15 also handle all the development work, and there's a lot of
16 development that's always going on because we are adding
17 location-based services, and the three of us, we also handle
18 the conversions, and right now we are in the midst of a very
19 heavy conversion schedule as we bring new switches online. So
20 to take one of our people away from our core business products
21 to work on this study, I'd have to talk to my boss about that
22 one.

23 Q. Was Western Wireless kind of in the same position?

24 A. I believe they went out and hired contractors to do
25 it. There's problems when you hire contractors because a lot

1 of times it's hard to find contractors with mainframe
2 experience and you certainly can't find contractors with
3 mainframe experience and telecom experience.

4 Q. Having read all the testimony and having gone through
5 how long it took Mr. Wilson, were you of the opinion that you
6 could cost justify doing this for 25 companies every six
7 months?

8 A. I would say from a business point of view, it's not my
9 decision. If that came down to, say, like I would love to make
10 the point we can't do it because we can't afford it. I'm not
11 the person that would make that decision. It's very expensive
12 to do. It's not easy, as we have referred to earlier.

13 Q. Yeah, there was testimony that a high school student
14 could do this in a couple hours.

15 A. I'd hire that high school student. No, you just
16 can't, not from the way that it's set up.

17 MR. WIECZOREK: That's all I have. I would move for
18 the admission of 22, I believe.

19 MR. SMITH: Any objection to 22?

20 MS. ROGERS: No objection.

21 MR. COIT: No objection.

22 MS. WIEST: No objection.

23 MR. SMITH: WWC 22 is admitted.

24 EXHIBITS:

25 (WWC Exhibit No. 22 received into evidence.)

1 MR. SMITH: Ms. Rogers, are you next on the roll here?

2 MS. ROGERS: Yes. At this time I would like to ask
3 for a five- or ten-minute break. Since we did not have any
4 prefiled testimony in this case, I'd like a little chance to
5 review my notes and talk to our expert witnesses as well.

6 MR. SMITH: Unless the commissioners have an
7 objection, I think that's a reasonable request.

8 VICE-CHAIR JOHNSON: Absolutely.

9 MR. WIECZOREK: Is it five or ten?

10 MR. SMITH: We are talking a ten-minute recess.

11 (Whereupon, the hearing was in recess at 11:05 a.m.,
12 and subsequently reconvened at 11:20 a.m., and the following
13 proceedings were had and entered of record:)

14 MR. SMITH: The hearing is reconvened. It's a
15 quarter after 11:00. How are you doing, Ms. Rogers?

16 MS. ROGERS: Not very well.

17 MR. SMITH: Take the time you need and I see Mr.
18 Oliver has got his seat so we are ready to go. Are we online,
19 Mr. Chairman?

20 VICE-CHAIR JOHNSON: We are.

21 CROSS-EXAMINATION

22 BY MS. ROGERS:

23 Q. Mr. Oliver, my name is Darla Rogers and I represent
24 the Golden West Companies in this case. I am not a technical
25 person, so if I ask questions that don't make a lot of sense to

1 you, perhaps you will help me get through the questions so we
2 are at least on the same wavelength. You testified in direct
3 examination that you worked with CDRs for billing purposes; is
4 that correct?

5 A. That's correct.

6 Q. Have you worked with CDRs for anything other than
7 billing purposes?

8 A. We use CDRs to research problems on subscribers'
9 bills, subscribers that say I never placed that call and we
10 would call the CDR to investigate that.

11 Q. That would be the extent of your work with CDRs?

12 A. Uh-huh.

13 Q. Could WWC provide Golden West a copy of the AMA flat
14 file collected from the switch?

15 A. Certainly we could, but I always have an issue with
16 that. Before I would be able to turn like the raw CDRs over, I
17 would have to check with our legal department because there's a
18 lot of proprietary information in there and I sign
19 confidentiality agreements, that within the CDRs they have
20 people's dialing patterns, their wireless phone numbers,
21 there's a lot of information that I'm not sure what Alltel's
22 position is on that.

23 Q. But my question was, and I maybe didn't make it clear,
24 technically --

25 A. Absolutely.

1 Q. -- would it be feasible? In fact on your exhibit,
2 these raw AMA records and this center part could actually be
3 sent or provided to multiple sources, not just to the
4 ReforMaster; is that correct?

5 A. Yes, they would probably come out of the tape archive
6 that's shown in the block off to the right.

7 Q. And with regard to the archive off to the right, prior
8 to the purchase of WWC, how long did Alltel archive those
9 records?

10 A. Historically, we always kept our call records for 90
11 days up until December of 2004 and at that point we changed our
12 retention period to two years. So we don't have a complete
13 two-year history yet, but I guess as of like this upcoming
14 December, from that point forward, we will have two years of
15 historical backup.

16 Q. You testified that you read or reviewed a lot of the
17 testimony in this case.

18 A. Yes.

19 Q. Did you also review the contract between the parties?

20 A. I have never seen the contract. I only saw the
21 references to the contract in the e-mail string.

22 Q. So you are not aware, then, that within the contract,
23 Western Wireless was required to retain records for one year?

24 A. No, I'm not.

25 Q. You testified that Alltel has a lot of databases.

1 A. Yes.

2 Q. Can you quantify that for me?

3 A. You know, in our billing system, there is the
4 mainframe batch site that's run out of Wilkes-Barre,
5 Pennsylvania where I work, and then there is the client server
6 database side of the billing product that's run out of Atlanta,
7 and I have very little interaction with the people that take
8 care of the database. It's on a different hardware platform
9 and a different software language and I don't have access to
10 that data, so I don't know how many databases they have. I
11 think many because it's not like all, you know, one big huge
12 file and database. I think there's many, many databases that
13 interconnect based on key pieces of data.

14 Q. Twenty-five, 30?

15 A. I would think much more than that.

16 Q. Much more than that, okay.

17 A. Uh-huh.

18 Q. Are databases, like the ones you work with, are they
19 hard to work with once you get used to what you are doing with
20 them?

21 A. I don't work with any databases because being a
22 mainframe programmer and being in charge of the CDR, we don't
23 have any databases. In fact our mainframe computer, there is
24 an IBM database product called DB2, but Alltel doesn't
25 subscribe to it, so to make any database, I would have to load

1 it to another platform and that's not something I've ever done.

2 Q. So that's not within your area of expertise?

3 A. No, it's not.

4 Q. If WWC furnished the results of a database query of
5 CDRs, are you aware of how they did that?

6 A. I believe in the testimony that I read, Mr. Wilson
7 said that he was working on getting access to a CDR tool and
8 they populated that data, and I believe they intercepted the
9 call records prior to them going to AMDOCS to load it into
10 their CDR analysis tool, which I believe that was a Unix-based
11 computer that they had used for that.

12 Q. So again on your diagram, there would be maybe another
13 output from the raw AMA records where those would have been
14 processed in a separate database?

15 A. I believe they intercepted the transmission between
16 the call collector box on this diagram and the raw AMA records
17 diagram box and they took it and then they began collecting
18 calls for the 15 days that were used in the study.

19 Q. So there would be another database added on here
20 someplace, CDR database?

21 A. Right, it would be another computer and another
22 database that was created. Again, my knowledge of that is only
23 based on what I've read in the testimony.

24 Q. So you didn't personally review how that was done?

25 A. No, I have not.

1 Q. Have you ever heard of Tekno or Tekelec and their
2 products to analyze CDR records in a relational database?

3 A. No, I have not.

4 Q. Do you know if WWC has one?

5 A. No, I do not.

6 Q. How would Alltel determine the amount of traffic
7 between two end offices?

8 A. I would imagine that would be done as an engineering
9 study, not off the CDRs.

10 Q. You have no personal knowledge?

11 A. No. I have never done a traffic study on CDRs.

12 Q. Would you personally be able to write a program to
13 read raw CDRs and create interMTA call records?

14 A. If I was provided the information for which CDRs
15 belonged to which MTAs, yes.

16 Q. You testified that you had never heard of MTA prior to
17 your preparation for this hearing.

18 A. Yeah. I'm familiar of course with like NPA-NXXs and
19 LATAs from my work with interLATA calls back in the equal
20 access days, but the term MTA is not something I've run into
21 with my billing background.

22 Q. Do you know how many MTAs there are in South Dakota?

23 A. You know, I should know that from reading the
24 testimony. I'm thinking there were around seven, was that a
25 bad guess?

1 Q. It's a little high.

2 A. Okay.

3 Q. So your response is you don't know?

4 A. I don't know.

5 Q. Can the raw CDRs or the raw AMA records be used for
6 multiple purposes?

7 A. Yes, because there's information on there, like I'm
8 trying to think of another purpose you would want to use them
9 for. In our process, we only use them for billing and we only
10 read the record once. We don't -- I said 128 million records a
11 day. They get read once unless we go back for research to pull
12 a specific call.

13 Q. But nevertheless --

14 A. Sure, there's many fields on there and if you needed
15 to study it, you could get additional information out of there.

16 Q. Once a database is created, is it difficult to use?

17 A. Well, again, I don't have caller records in a
18 database. I haven't used that type of tool, but from what I
19 understand, that once you get past the overhead and the expense
20 of setting up a database and you have the data keyed correctly,
21 if you needed to call up by the specific key, then that should
22 not be difficult.

23 Q. There has been quite a bit of testimony, and I'm
24 assuming that you reviewed it, on a CDR study. My question to
25 you is, how would you do a CDR study?

1 A. Well, I wouldn't use a database. I would use -- I
2 would have to go back to the flat files, so there would be a
3 number of steps involved. You would need the identification
4 step for which volumes of call data would be brought into the
5 study, and then as I spoke in my testimony earlier, the period
6 of time where you need to figure out which calls are eligible
7 for the study. Because on the surface it seems easy, they
8 originate and they terminate based on these criteria, but
9 there's a lot of exceptions. And with so much writing on it,
10 being the programmer, I would want to make sure that I had all
11 of the questions that I could come up with clarified prior to
12 beginning the coding.

13 Then as far as the coding goes, we had mentioned how
14 there's both Nortel and Lucent switches. That would take
15 different logic and different programs to process each of
16 those. Now you are talking about running the program that
17 would do that, the filtering and the selecting over the time
18 period that you are talking about for those 15 days, and then
19 you would have a summary job that would do the reporting and
20 you would have to break it down. You would have multiple
21 operating companies so there would probably be multiple
22 reports. So there's a number of steps to go through. I think
23 I'm qualified to do all those various steps, but it's a time
24 consuming process.

25 Q. How long do you believe it would take you to create a

1 program to do a CDR study?

2 A. Well, I guess my point is that it's more than just
3 writing the program. I think the programming time of, say, the
4 module just to read the, say, just the Lucent format to break
5 down a piece of a piece of a piece, a program like that
6 probably gets written in maybe a 10- to 25-day period, because
7 of the time to verify to make sure the code is correct and all
8 of that.

9 Q. But again, this is not something you have ever done
10 personally or been asked to do; is that correct?

11 A. I support both CDRs and my business tool is the COBOL
12 programming language that reads those CDRs, so I would be able
13 to do that. I've added programs to our logic to write reports
14 based on how many calls hit specific special numbers, for
15 example, and add them into our production job stream.

16 Q. If the interMTA study was based on conversation times
17 or conversation time, would it matter how long a phone rang or
18 if the phone was not answered?

19 A. Well, it would, because on CDR records, there is two
20 times when a call starts. There's the time populated on when
21 the phone begins to ring and then there's a second time, which
22 is when the phone is actually answered. And for billing
23 purposes, if you are doing an outgoing call, we would begin --
24 we start the clock with when the phone begins to ring.

25 Q. Excuse me, that is conversation time, isn't it?

1 A. No, I would think conversation time would be from when
2 the other party answers the phone.

3 Q. Did WWC have an option to provide MTA information to
4 Golden West and the other companies?

5 A. I'm not sure I understand the question.

6 Q. Well, your testimony appears to be that it was not
7 easy for them to do that.

8 A. That's correct.

9 MR. WIECZOREK: I'm going to object. His testimony
10 wasn't -- it went to the interMTA and I believe she said MTA
11 information. It's a misstatement of what his testimony has
12 been.

13 MR. SMITH: Do you want to clarify your question?

14 Q. (BY MS. ROGERS) Sure. Did WWC have an option to
15 provide interMTA information to Golden West?

16 MR. WIECZOREK: I object as it calls for a legal
17 conclusion as to what the obligations were under the contract.

18 MR. SMITH: Overruled. You can answer if you can. If
19 you can't, just say so.

20 A. Is your question implying that it was optional whether
21 or not WWC chooses to do the study? I'm not sure I understand
22 the legal term of "option," I'm sorry.

23 Q. (BY MS. ROGERS) Well, you have talked about -- you
24 have talked about -- you testified as to business priorities
25 and how LNP became a big priority.

1 A. Yes.

2 Q. Well, in this case you testified I believe that it may
3 not have been a business priority for WWC to provide this
4 information, the interMTA information.

5 A. It's not part of our core business product. We have
6 certain items that industry mandates and purchasing of other
7 phone companies that have to be, also by contract, completed on
8 certain dates. There's a large number of deadlines that are
9 legally responsible, that they must be completed by a certain
10 date.

11 Q. But in this case didn't WWC by contract agree to
12 provide the interMTA information?

13 MR. WIECZOREK: I'm going to object again. The
14 contract specifically says they come up with a study. It never
15 says we had to provide this specific information and it's
16 calling for a legal conclusion what our obligation was under
17 that language.

18 MR. SMITH: Sustained.

19 Q. (BY MS. ROGERS) It's not your testimony today that
20 WWC could not technically do that or provide this information,
21 is it?

22 A. That's correct, right.

23 Q. You testified concerning call forwarding; do you
24 recall that?

25 A. Yes, call forwarding calls.

1 Q. What percent of the calls of WWC are call forwarded,
2 do you have any estimate on that?

3 A. You know, our reports, I could find out exactly if I
4 had access to the reports that we generate, because we break
5 down like, say, in the case of Nortel there's 200 different
6 types of call scenarios of which call forwarding would make up
7 a few, and I would be able to get that exact number, but I
8 would, if I just had to fathom a guess, hopefully better than
9 my guess on how many MTAs I gave you earlier, I would say you
10 are probably talking like, say, 5,000 per switch per day.

11 Q. So that would be a small percentage of the total
12 number of calls per day.

13 A. Well, 5,000 calls at a minute a piece, but I think
14 what people don't realize that on these CDRs, it's the gross
15 revenue stream coming into Alltel and there's really nothing
16 small as far as like we will just ignore this piece or that
17 piece, because with such high volume, it all adds up to large
18 dollar volumes, especially after you do 15 days and you
19 extrapolate it for a year, everything becomes large.

20 Q. Do you think that 411 calls are routed to Golden West?

21 A. The 411 is not, but I believe the call completion leg
22 would be.

23 Q. Does Alltel hire consultants on a routine basis?

24 A. I have not had a contractor or a consultant in my
25 group for I'm going to say five to 10 years. As a regular

1 basis, we don't, and perhaps it's because our data processing
2 center is in a rural area of Pennsylvania and we tend to hire
3 employees and train them and keep them for a long time.

4 Q. How much space would be required to store the records
5 associated with WWC terminating to Golden West?

6 A. In tracks or in gigabytes? On Unix servers they count
7 space in gigabytes and mainframes we count them in terms of
8 tracks and cylinders. I think the problem I have with the
9 question is that given like the volume of CDRs we have, there
10 is an extraction that's going to come out for the number of
11 calls that are eligible for the study, and I believe that's the
12 quantity you are talking about.

13 Q. Well --

14 A. I'm not sure what the ratio is. Like I don't know if
15 the calls going into the study are like 10 percent of our
16 volume, 20 percent of our volume.

17 Q. Well, for example, if the two-week period of the
18 traffic study that was involved here for the Golden West Co-op,
19 which is one of the seven companies, the CDRs that were turned
20 over constituted 30 megabytes of data.

21 A. Okay.

22 Q. Would you agree with me on that?

23 A. That could be.

24 Q. So that means for even one year, you are talking about
25 a little less than one gigabyte of data; is that correct?

1 A. I guess again in the mainframe world, we don't count
2 it as gigabytes, but that sounds reasonable.

3 Q. But that is certainly something in today's world that
4 is manageable or able to be transferred from one entity to
5 another; would that be a fair statement?

6 A. Uh-huh, I think so.

7 Q. Are you familiar with SS7?

8 A. I know that SS7 is the communication link that takes
9 place behind phone calls being placed. I know that SS7 is used
10 for, in the wireless world, for things like routing of the call
11 and it's used for like finding the TLDN number on call
12 delivered calls. I've never seen an SS7 record. It's not a
13 file that gets passed to billing. We don't use it for any
14 billing applications, so it would never reside on the products
15 that I support.

16 Q. So do you know if SS7 records would be similar to
17 CDRs?

18 A. From what I understand, it doesn't contain like the
19 cell site location and it doesn't have the MIN slash MDN
20 separation.

21 Q. But other than that, it would contain similar?

22 A. I believe it has like the terminating phone number,
23 but I don't think you can identify the originating point using
24 SS7.

25 Q. And again, this is not something that you have

1 utilized or reviewed in your experience in the billing
2 department?

3 A. Correct.

4 MS. ROGERS: I think that's all I have. Thank you.

5 MR. SMITH: Thank you. Mr. Coit, are you ready?

6 CROSS-EXAMINATION

7 BY MR. COIT:

8 Q. Good morning, Mr. Oliver.

9 A. Morning.

10 Q. You currently are an Alltel employee, then, correct?

11 A. Correct.

12 Q. And you have never been an employee of Western
13 Wireless?

14 A. No, I have not.

15 Q. Going to WWC Exhibit 22, I have a few questions. The
16 call collector that's shown on the left side, could you explain
17 again what that is?

18 A. We actually use a third-party product for the call
19 collector, the product name is BILLDATS, B-I-L-L-D-A-T-S, and
20 originally that was developed by Lucent and then it's now owned
21 by the CSG Company and we use that for our product to pull all
22 of the switches in the Alltel network.

23 Q. So that basically is a product that pulls all of the
24 AMA/CDR records off of the various switches you have within the
25 Western Wireless/Alltel network?

1 A. That's correct.

2 Q. You had talked some about some client servers or data
3 being pulled off into the client server side; is that correct?

4 A. Yeah, and the client server side is separate from the
5 usage, CDR usage mainframe billing side. That would be more of
6 your customer support, customer care products.

7 Q. And the client server side, I'm assuming that on that
8 side there are -- I think you have indicated that they would
9 use numerous relational databases; is that correct?

10 A. Yeah, the structure of account-based customer care
11 processing lends itself well to relational databases and that's
12 the technology they would use on that side of the house.

13 Q. Just for my own curiosity, relational and using that
14 term in connection with database, why relational, why is it
15 used?

16 A. I guess it's the difference between having to read
17 from like the top down, like reading every record. Like if you
18 had a million records and somebody said, give me all the calls
19 that belong to this mobile, it takes -- it would take a while
20 to read every single record to answer that question. So you
21 really couldn't base a billing system where you needed computer
22 terminals to be able to instantly access all the data, so with
23 a relational database, you anticipate ahead of time methods of
24 how you are going to go in to query the information. So there
25 is key files that work in the background so that you can like

1 key in a subscriber's phone number and instantly access the
2 data records that have that field that you are looking for.

3 Q. So basically it's a way of describing that database as
4 being a searchable database through a query process?

5 A. Yes.

6 Q. CDR data, you had indicated earlier in your testimony
7 that other than using it for customer billing within your
8 process, you are aware of no other business need for using the
9 information; is that correct?

10 A. Well, I'm trying to think here of any other business
11 need. Like we only read the CDRs once. I can't think of any
12 activity that we have going on where we would, say, routinely
13 go and restore past CDR files. It's not an activity that we do
14 in our core of business at Alltel.

15 Q. Are you aware at all of whether any CDR data is used
16 in network planning for either Alltel or Western Wireless?

17 A. I am not, but I know that if you needed to access
18 large volumes of CDR data, you would have to come to myself or
19 somebody, one of the other two people in my department because
20 we are the only ones that store the data for two years.
21 There's other places that the CDR data flows through, but the
22 retention period is usually only a matter of days.

23 Q. Do you know what the retention period is on the client
24 server side of the business that you referenced?

25 A. Well, there is no retention of CDR data on the client

1 server side. It never goes there.

2 Q. So on the -- with respect to the customer billing,
3 correct me if I'm wrong, you just indicated, then, that you
4 keep it for two years for that purpose.

5 A. We keep CDRs for two years for research purpose, yes.

6 Q. Are you aware of any regulatory need for keeping any
7 CDR data?

8 A. I believe the decision behind changing from 90 days to
9 two years was based on regulatory, but I don't know what that
10 regulation would have been or what outside force encouraged
11 Alltel to increase the retention.

12 Q. So you are not aware of any reason to keep CDR
13 information, any CDR information for tax purposes?

14 A. No, I'm not, and I'm quite sure we don't use CDRs for
15 tax purposes, mainly because there's no pricing or rating
16 that's been applied to it yet. That happens later in billing.

17 Q. Aren't taxes both interstate and intrastate?

18 A. I believe so.

19 Q. And in tracking revenue, might there not be a need to
20 determine whether calls are interstate or intrastate?

21 A. That information would be only -- would only need to
22 come from call records that would be billable, call records
23 that would be generating revenue. For example, I had mentioned
24 we drop 60 percent of our CDR volume. The call records that we
25 drop would never have any tax impact. Now, the CDRs that we

1 keep and pass down to rating and billing, there would be prices
2 assigned for like how much revenue would come in on those CDRs.
3 They would be passed to customers' bills, and at that point I
4 believe it would be taxable. But that would not be the source
5 document for the taxable, which I believe is your question,
6 would be records that come out of billing later on in our
7 process.

8 Q. So the CDRs that you keep, where do they go? What
9 other places do they go to?

10 A. They go --

11 Q. Other than the mainframe for rating and billing, do
12 they go anywhere else, the CDRs that you keep?

13 A. There's a daily feed of CDRs that go to our fraud
14 product. I'm not real familiar with it, but our fraud people
15 have a realtime feed of CDRs that come from the switches, and
16 they use that to determine if you make a phone call, say, from
17 Pennsylvania and California within 15 minutes of each other to
18 spot trends. I'm really not familiar with how that works.
19 It's like a realtime application that looks at the calls as
20 they are taking place.

21 Q. So it goes somewhere for purposes of some fraud
22 detection; is that what you are saying?

23 A. Yeah, I believe fraud detection gets a feed of the
24 CDRs also.

25 Q. Are you aware of whether it goes anywhere else?

1 A. I can't think of any other applications at this point.

2 Q. So you are quite positive that it goes nowhere else
3 within the company?

4 A. Yes.

5 Q. Just for those two purposes?

6 A. Again, I don't deal with the fraud side, but it's my
7 understanding that BILLDATS sends data to fraud and they send
8 data to ReforMaster.

9 Q. And some of the CDR information that you keep does get
10 used on the client server side, client service side; is that
11 correct?

12 A. Not in CDR format. I would say the closest thing that
13 we would have that would answer your question would be CDRs
14 that we have converted to billing records that we have passed
15 down to billing. We call it our unbilled call history. These
16 would be calls that are due to be billed in an upcoming cycle,
17 so that for example, if you went into our online client server
18 system to call up your account, the customer service rep could
19 tell you calls that you have made that have not yet hit a bill
20 cycle, so there's a 30-day period of CDRs that have been
21 converted to calling records and are available on our client
22 server system that have not yet been billed. They are not in
23 CDR format, they are in the format that is, say, the output of
24 ReforMaster and it's a summary record that only keeps a small
25 volume of data and that's available to the online system.

1 Q. There's all kinds of different information that's
2 included within the CDR data, correct?

3 A. That's correct.

4 Q. The CDR records.

5 A. Yes.

6 Q. So when we are talking about archiving that data, we
7 are just talking about archiving the CDRs in their CDR format?

8 A. Yes. We always want to keep that record unmodified
9 because when somebody says, I never placed that phone call, we
10 want to pull the actual record as it left the Lucent or Nortel
11 switch to show exactly how it came out to validate that we
12 billed it correctly.

13 Q. So on this WWC Exhibit 22, that's the data that's
14 archived over here on the right side?

15 A. Yes, raw unmodified records.

16 Q. But as far as the information that's in a CDR record
17 and all of these relational databases that we have talked
18 about, isn't there quite a bit of information in those
19 relational databases that really is information that's drawn
20 from a CDR record?

21 A. I don't think so.

22 Q. Where does it come from?

23 A. Well, the usage comes from, you know, like individual
24 phone calls that you make, that information gets written to a
25 CDR and we convert it to a file that gets passed into mainframe

1 rating and billing. Maybe I need you to ask the question
2 again.

3 Q. Well, there's all kinds of information in a CDR
4 record, information on I suppose originating number,
5 terminating number.

6 A. Uh-huh.

7 Q. Time of the call.

8 A. Yes.

9 Q. Conversation time. All of that information -- the
10 relational databases that we talk about and that have been
11 testified to here today, where do they get their information
12 from if they don't get it from the AMA or CDR records that come
13 off the switch?

14 A. That usage information doesn't actually make it to a
15 database. The usage information comes from the CDR and it gets
16 passed down into billing and that would be the section of your
17 bill that shows the detail of the calls that you placed. The
18 relational database aspect of your bill relates to when you
19 signed on with Alltel, what rate plan you are on, what's your
20 name, your address, your opening balance, that type of
21 information, what kind of phone do you have, information that
22 you would find by looking up your account on a Web site, for
23 example. That's the relational database piece. Now, you can
24 go in and you can look at your recent call activity, which was
25 that unbilled file that I just talked about, but that only

1 contains 30 days of data and only limited number of fields.

2 Q. Do any of the relational databases pull any
3 information off the mainframe system, which has all of the
4 usage information?

5 A. That unbilled call file that I was just referring to
6 that had the usage that has not yet been billed, we transmit
7 that to the client server machine each day.

8 Q. Are you aware of whether Alltel or Western Wireless
9 uses any sort of CDR data or information taken from CDRs to
10 determine what its USF contributions are?

11 MR. WIECZOREK: I object as beyond the scope of direct
12 and beyond the scope of this hearing.

13 MR. SMITH: Can you repeat the question, Carla?

14 (Whereupon, the Court Reporter read back the requested
15 portion.)

16 MR. SMITH: I'm going to sustain that. You don't need
17 to answer that.

18 Q. (BY MR. COIT) Is it your testimony today that neither
19 Western Wireless or Alltel has done anything at this point to
20 actually determine whether its traffic sent to landline
21 companies for termination is either interMTA or intraMTA
22 traffic?

23 A. I'm sorry, I'm going to have you ask that again.

24 Q. From your direct testimony, based on that, is it your
25 testimony that neither Western Wireless or Alltel has done

1 anything at this point to actually determine whether its
2 traffic sent to landline companies for termination is either
3 interMTA traffic or intraMTA traffic?

4 A. I have not done any work in that direction.

5 Q. Have you ever been informed that there may be a need,
6 based on either Western Wireless's or Alltel's contractual
7 obligations with other carriers, to identify traffic as either
8 intraMTA or interMTA traffic?

9 A. Only from my reading of the testimony.

10 Q. So nobody approached you at any time in your
11 employment with Alltel giving you an indication that there
12 might be a need some day to take CDR information for purposes
13 of determining whether traffic is interMTA or not interMTA?

14 A. Correct. The first time I was approached was I
15 believe back in April after the last time this body met.

16 MR. COIT: That's all I have.

17 MR. SMITH: Thank you. It's five to noon. Ms. Wiest,
18 do you want to start now, and the commission, or would you
19 prefer to take our recess now and have staff commence following
20 our noon recess?

21 VICE-CHAIR JOHNSON: Whatever Ms. Wiest's preference
22 is is fine by me.

23 MR. SMITH: Rolayne.

24 MS. WIEST: I would prefer to take a break now,
25 assuming we wouldn't get done with this witness before we would

1 take a lunch break.

2 MR. SMITH: Yeah, and I don't think that will happen.
3 Why don't we recess and what's the commissioners' preference on
4 duration of the recess?

5 VICE-CHAIR JOHNSON: Let's do an hour and a half, if
6 that's all right with everybody. That would be 1:30.

7 MR. SMITH: Sounds good. We are in recess until 1:30.

8 (Whereupon, the hearing was in recess at 12:00 p.m.,
9 and subsequently reconvened at 1:45 p.m., and the following
10 proceedings were had and entered of record:)

11 VICE-CHAIR JOHNSON: The time is almost 1:45. The
12 commission apologizes for reconvening late. I was receiving
13 some legal advice from counsel and I'm a bit dense from time to
14 time, so I had a number of questions, but at this point we will
15 reconvene. Our apologies to everyone listening on the
16 Internet, and Mr. Smith, take it away.

17 MR. SMITH: Ms. Wiest, does staff have
18 cross-examination?

19 MS. WIEST: Just a few questions.

20 MR. SMITH: Mr. Oliver, please take the stand. You
21 are sworn, you are still under oath.

22 THE WITNESS: Yes, sir.

23 CROSS-EXAMINATION

24 BY MS. WIEST:

25 Q. Good afternoon. So today if you were to be told that

1 you have to do a traffic study that's at issue, what would be
2 your first step? Where would you get the CDR information, at
3 what step on your graph?

4 A. We would be pulling the CDRs out of the tape archive,
5 that would be the block on the right-hand side.

6 Q. And would that be a fairly simple process or it
7 wouldn't take too long to pull that?

8 A. That's fairly simple.

9 Q. It could be done within a day or two?

10 A. We probably wouldn't restore all of the files at once,
11 just because of the size. We would probably bring them down in
12 pieces because I believe we are talking about four switches
13 over 15 days volume. There wouldn't really be a need to bring
14 all of those calls down at one point in time because we would
15 be -- we wouldn't process them all in one run, so we would
16 likely bring some down, process them, and then bring additional
17 ones down and continue to process.

18 Q. But that would not be a long process to do that?

19 A. No, the actual processing is not a real long process,
20 no.

21 Q. I think you stated that the most difficult process
22 would be -- would that be coming up with the correct queries to
23 make then of that database?

24 A. I think it would be the interpretation, like getting
25 answers on which calls are included and not included, and then

1 I think the other difficult area is the ongoing nature of the
2 study in that it doesn't really have a finite start and stop.
3 It seems like it's going to -- the way I read in the testimony,
4 that the plan was to do a revolving study like every six months
5 for a rotating number of companies. The study kind of changes
6 and it has a long life cycle.

7 Q. So there would be the initial study and then every six
8 months there would be essentially an updated traffic study; is
9 that your understanding?

10 A. Right. I would envision like when the study starts
11 over again, of course you would have some economies of scale
12 because you had already written the program, but you would need
13 to go back and verify the trunking hadn't changed and verify
14 the new cell sites and the MTA relationship.

15 Q. I believe Mr. Musick testified that the basic method
16 for extracting raw data from CDRs would be the same for
17 wireless versus wireline, except wireline would not have the
18 cell site. Would you agree with that?

19 A. There would be additional fields besides cell site,
20 like ESN number, and we have types of calls like SMS, short
21 messaging. Just based on the different technology, there's
22 things available with wireless that aren't in wireline, but
23 actually I'm starting to speak -- the most important difference
24 is probably the local number portability and the MIN and the
25 MDN.

1 Q. And then if it was determined that the Golden West
2 Companies would be doing the traffic study, how difficult would
3 it be to provide them with the raw CDRs?

4 A. I guess my first comment would be I would be concerned
5 about them interpreting the data just like I'm concerned about
6 myself getting the correct answers to interpret the data. I
7 think Alltel is probably more familiar with what's in the CDRs
8 and what they represent and ask the correct questions for
9 clarification than turning it over to the other side, but that
10 probably wouldn't be my call.

11 Q. But just for the first step of just transferring the
12 data to them, how difficult would that be, without going to the
13 question of whether they could do the proper queries?

14 A. If you leave out like the time that it would take, the
15 actual technology to transfer data, it's not real complicated,
16 but again my concern there would be privacy issues and whether
17 or not my legal department would consent to that.

18 Q. And then continuing on the difficulties with getting
19 the right queries, would one such problem be any possibility of
20 IXC traffic contamination?

21 A. This is an area I'm not real familiar with what -- if
22 that's clearly defined, because in today's billing world we use
23 CDRs to bill the subscribers and whether or not it was sent
24 over an IMT or an IXC has never been a concern for me, so I'm
25 not real familiar with whether or not that's clearly defined on

1 the CDR. I know from reading the testimony, somebody else had
2 mentioned that when an IMT gets maxed out and it's like the
3 traffic is full on the IMT, that the switches have the ability
4 to route that over IXCs sort of like an overflow buffer method
5 of routing the calls. And I'm not sure if that's indicated on
6 the CDRs or not. I know there was talk about peg counts and I
7 know peg counts are not included on the CDR. That would be
8 something like a statistic that comes out of the switch.

9 Q. So then if you have intermachine trunking and it's a
10 busy time and you have overflow of that traffic, I believe Mr.
11 Musick had testified that you can look at the registers to see
12 the percentage of traffic that overflowed. Do you agree or
13 disagree with that?

14 A. I believe when he's talking about the registers, he's
15 talking about information that comes out of the switch in
16 realtime. If he was implying that the registers are attached
17 to the actual CDR record, I would disagree.

18 Q. Would it be possible, then, to quantify the amount of
19 IXC traffic using the registers or not?

20 A. I don't believe so. First of all, that information
21 doesn't get transmitted to the billing vendor, to the billing
22 platform, but I look at that as information that are like
23 realtime statistics that are kept on the switch that are in
24 total, like statistics based on the total volume at the switch
25 level, and we are doing a study on like 15 days worth of

1 individual call data that happened 15 days ago. I don't think
2 you would be able to ever make a correlation between those two
3 things. Now, maybe you use a factor or an allocation, but that
4 just I think adds to the complexity of some of the items we are
5 discussing.

6 Q. And I think you said that when you go into the
7 ReforMaster, maybe 60 percent of CDRs are eliminated; is that
8 correct?

9 A. Yes.

10 Q. And would that be one entire -- are you talking about
11 entire CDR records or fields off of separate CDRs?

12 A. That number would correspond to one entire CDR record,
13 and one of our switches we drop almost 90 percent of our
14 traffic just because of the way the network is set up between
15 TDMA and CDMA, the two broadcast. If a CDMA customer makes a
16 call on the TDMA switch, it generates an additional
17 land-to-land call between the two Pocatello and Twin Falls
18 switches in Idaho, so based on where the switches are located
19 and how they are set up, that ratio changes.

20 Q. And then going to the retention of these records, was
21 it your testimony that Alltel used to keep them for 90 days and
22 now since 2004, you keep them for two years?

23 A. That's correct. I believe it was December of 2004 is
24 as far back as we go.

25 Q. Did you state you thought that was for regulatory --

1 due to regulatory purposes?

2 A. It wouldn't have been the business pushing for it. I
3 believe it was regulatory, but I'm not sure what regulatory or
4 what outside force caused us to change the retention, but it
5 wouldn't have been for the purpose of doing research on the
6 caller records, because after 90 days, the subscriber is past
7 three billing cycles, it would be unusual to go back that far.

8 Q. And then you mentioned that Western Wireless, it was
9 your understanding, keeps the CDRs for 90 days. Would that be
10 either archived or do they keep archived backup CDRs for longer
11 than that, do you know?

12 A. I never asked them. They kept it for 90 days and I'm
13 not sure if that was a tape backup the way we do or if they had
14 that on disk.

15 Q. You were talking about the problems that would be
16 encountered if you wanted to I assume pull information off the
17 ReforMaster, but if you were doing that traffic study, you
18 wouldn't actually be taking the information from there, right,
19 you would actually just be using the archived information?

20 A. Correct, I would go back to the raw input.

21 Q. And then you also were talking about the updating of
22 the studies. I believe you mentioned that you would be afraid
23 to rerun those without going back and reverifying some of the
24 inputs, and one of those inputs or one thing you mentioned was
25 like the tweaking of cell sites. But my question is how would

1 the tweaking of a cell site change any of the data that would
2 be in this type of a traffic study? Because the cell site
3 would still be in the same position, right?

4 A. As I understand it, cell sites have their -- they have
5 different sectors and they point in different directions and
6 the engineering people can adjust that to change the coverage
7 area, so I'm thinking that if they were to adjust the sectors
8 on cell sites, that it could possibly interfere with -- not
9 interfere, but change from one MTA to another.

10 Q. Even though the cell site itself stayed in the same
11 place?

12 A. Well, if you were to change the pointing of the cell
13 site to a different direction, it could.

14 Q. And you think one of the queries would have to be a
15 query regarding 411 numbers? Would that be a query you would
16 have to make? You said that would be one of the problems, was
17 how 411 calls were handled.

18 A. Yeah, I believe I was talking more about the call
19 completion leg of 411. It makes two records, and if you were
20 to -- to be accurate, if somebody dials 411 to connect a call
21 to a terminating number within one of the areas of the study,
22 the 411 call that contains the cell site doesn't contain the
23 number that it was actually terminated to. So when the other
24 leg record comes through, we have the terminating number but we
25 don't have the cell site. So on those calls in billing we just

1 assume that they all come out of the center of the switch, when
2 in reality the subscriber that placed that call is at a
3 specific cell site, and again, I don't know if it's
4 significant, but before I would do the study, I would want to
5 have those type of nuances confirmed.

6 Q. And so if we are talking about parties agreeing to a
7 traffic study methodology, would you envision that the main
8 problem areas would be the type of queries and perhaps the
9 length of the study to try to come up with a traffic study
10 methodology?

11 A. Yeah, and even more so, the ongoing nature of the
12 study that was defined here.

13 Q. Any future updates you mean?

14 A. The future updates and also the -- it's not like you
15 do it and you are done. It's six months from now it's going to
16 come up again, so I think it has the potential to be ongoing
17 and take a lot of manual effort over a long period of time.

18 MS. WIEST: Thank you, that's all I had.

19 THE WITNESS: Thank you.

20 MR. SMITH: Commissioners, questions of Mr. Oliver.

21 CROSS-EXAMINATION

22 BY VICE-CHAIR JOHNSON:

23 Q. I do have one. Good afternoon, Mr. Oliver.

24 A. Good afternoon.

25 Q. This is a question that I think is similar to one that

1 Ms. Wiest just asked, but coming at it from a little bit
2 different perspective, there are three people in your division
3 in your office?

4 A. My department, correct.

5 Q. In your department, right.

6 A. Correct.

7 Q. If the three of you were to independently from one
8 another design a traffic study methodology using the CDR data,
9 how similar would your results be when all three of you were
10 completed do you think?

11 A. That's a good question. No two programmers write the
12 program the same way.

13 Q. I'm not so concerned about, you know, the technique
14 they used, but the end result, how similar do you think that
15 the result would be?

16 A. Well, I would certainly hope they would be very
17 similar, but I don't think I want to jump to the conclusion to
18 say that they would be exactly the same. And I think that's
19 why I have so many open questions on clearly defining what
20 calls would be included in the study and what would not be
21 included in the study, because like our -- our software that
22 runs billing has taken years to iron out the little bugs that
23 occur over time, and to write something fresh like new computer
24 programs and interpret the data, you try to answer as many
25 questions outside as you can, but you also have to -- there is

1 room for the individual programmer to make assumptions as well.

2 And to put that together and run it and turn it over
3 to the people that will interpret the study and have large
4 volumes of revenue passing between two different companies,
5 it's almost like the first time you are running a billing
6 system, the first time you kick out a cellular bill, if you
7 know what I mean. You don't have the luxury of running
8 something over and over and over and working out the bugs.
9 It's a traffic study, which means you do your best to get it
10 right the first time, and being that you know it's only going
11 to run like this one time, it's very important that you do your
12 work up front and try to anticipate as many problems or
13 inconsistencies with the data before you get into it.

14 Q. This is another question that's similar to what Ms.
15 Wiest asked, so I apologize for any possible redundancy, but I
16 want to make sure I have the totality of the answer. You have
17 used words like presumptions and interpretations and
18 assumptions. Could you give me some idea of what kinds of --
19 what sort of forks in the road a programmer would have or
20 somebody working on putting together a traffic study
21 methodology, what sort of decisions and assumptions would have
22 to be made?

23 A. Sure. From hearing the testimony, it looked like they
24 had done this study and just went right out and said, well, if
25 it originates on a cell site in this MTA and it terminates to

1 this group of NPA-NXXs, then that's eligible for inclusion.
2 And that's fine on the surface and I'm not sure what percentage
3 you would be losing by doing that, but what if the
4 interpretation of one person says, we will only include
5 billable calls and another person says only include complete
6 calls. They sound very similar, but there's a huge difference
7 because we bill lots of incomplete calls. So I would not want
8 to be the programmer that assumes, well, they only want to
9 include calls that were answered, unless like I had asked the
10 question or it was written in the specs to say only include
11 calls that are answered.

12 And when they are talking about duration, I would want
13 to specifically say, are you talking from the time they
14 answered the call to when they hang up or is it send to end
15 time. We bill send to end, but perhaps for the purpose of this
16 study, since landline calculates it different, I would need to
17 remember to ask that question very specifically, is it from
18 answer to end or is it from send to end.

19 Q. Are there other interpretations or assumptions that
20 would have to be made?

21 A. Types of calls, like we had mentioned the directory
22 assistance call completion, that's a call that goes from -- it
23 goes from a subscriber to an NPA-NXX in one of these areas, yet
24 we don't know which MTA it started in because the CDR doesn't
25 contain the cell site information.

1 Q. Are there others?

2 A. Call forwarding calls, people that call forward their
3 phone to their house, there's a difference between call
4 forwarding on busy and call forwarding on no answer, because in
5 the one case it rings to your phone before it transfers to the
6 landline, and in the other case your phone is turned off, it
7 never rings, the switch doesn't know where you are and it would
8 appear to be coming from a different MTA.

9 Q. Are there others?

10 A. Give me a second and I'll think of one because in the
11 case of Nortel, we have 200 different scenarios out there. A
12 lot of scenarios don't apply, things like text messaging and
13 picture messaging and 1X networks, but then you have to say I
14 don't know, is there ever a case where you would be concerned
15 about 1X data calls, high speed access lines and broadband
16 calls. There's a lot of complexity in wireless today.

17 VICE-CHAIR JOHNSON: Thank you very much, Mr. Oliver.
18 That's all I have.

19 COMMISSIONER HANSON: Nothing.

20 MR. SMITH: I've got a couple here myself.

21 CROSS-EXAMINATION

22 BY MR. SMITH:

23 Q. One is this is a real -- this is just a record issue,
24 and you used the acronyms MIN and MDN --

25 A. Yes.

1 Q. -- is that correct? Could you please give us an
2 English version of what those terms mean, just in case we need
3 to use them?

4 A. Sure. MIN stands for mobile identification number,
5 MDN stands for mobile dialed number, and the difference is that
6 when you have a cell phone, the phone number, the number that
7 is in your phone belongs to your local carrier and that would
8 be your MIN. When somebody dials that phone, they call the
9 number that belongs to you, the subscriber, and that's your
10 MDN. So you could say that starting out on day one, let's
11 assume everybody has the exact same MIN and MDN, but now you
12 wish to change your carrier from Alltel to Verizon. You keep
13 the same phone number, but your MIN changes so your MIN will
14 change from Alltel to Verizon, but your MDN, which is your
15 personal number, stays with you.

16 Q. Thank you. When you were discussing the 411 calls --

17 A. Yes.

18 Q. -- you stated in there that that data you do get with
19 respect to your billing, your ultimate billing data, does in
20 fact show where the cell site, from which cell site the call
21 originated.

22 A. There's two records involved. The 411 record shows
23 the cell site, but it does not show the final completed number.
24 It only shows the cell site to either 411 or 555-1212. There's
25 a secondary record that comes through and they are not next to

1 each other, it might be 1,000 records later in the file that
2 has no cell site, but it shows your subscriber number and the
3 number that you called.

4 Q. Does that same information as originating cell site,
5 is that information reflected in the post ReforMaster data for
6 all calls?

7 A. Yes. In the case of the record I explained that had
8 no cell site, we would populate a cell site of 000.

9 Q. If there were no cell site.

10 A. If there was no cell site.

11 Q. But if it is a call that would be a normal call, and
12 again recognizing the problem with tandem and I guess phantom
13 or noncalls, nonreal calls, transiting type things, so then the
14 originating cell site is in fact present in the data that comes
15 out into the bottom box, which is mainframe rating and billing
16 data.

17 A. Correct.

18 Q. And is the -- okay, on the terminating end, what does
19 that box contain with respect to terminating identification,
20 terminating party identification?

21 A. That would contain the NPA-NXX line number of the
22 number that was called.

23 Q. Okay, does it -- just for clarification here, then,
24 for either of those, are they strictly -- now, with respect to
25 the cell tower, originating cell tower ID, that's what it is,

1 right, not the originating switch?

2 A. We would actually have a couple fields there. You
3 would have the tower, the switch, and the NPA-NXX of the cell
4 site would all be contained in the information passed to
5 billing.

6 Q. Okay, and that information, the same information is
7 contained with respect to at least the called number and is
8 there a geographical location attributed at all to the called
9 number or is it just the number?

10 A. We subscribe to a third-party service that gives us a
11 monthly file that tells us what's the geographic location of
12 all the NPA-NXXs in the United States that can be called.

13 Q. And is it possible to know from that data -- and these
14 would all be landline calls that we are talking about in this
15 case, so a geographic locator is in fact present, then, for the
16 terminating number.

17 A. Correct.

18 Q. For all of these.

19 A. Yes.

20 Q. Okay. In terms of the ReforMaster program, then,
21 again I'm just trying to clarify what we can get here, and
22 again the terms relational database versus linear or whatever
23 you call the other one, flat databases, I'm not sure I really
24 comprehend how all that works. But in terms -- as I understand
25 it now, when you send the raw AMA records in to the

1 ReforMaster, and the outputs from that both go into your
2 mainframe rating and billing system.

3 A. Yes.

4 Q. And those outputs also are then supplied to the
5 customer interface relational databases that are located in
6 Atlanta.

7 A. Yes, for 30 days worth, right.

8 Q. That's 30 days worth of that and it's the exact same
9 data.

10 A. Yes.

11 Q. Okay, I guess now I'm trying to comprehend, then, why
12 this problem -- we have 30 days of data there. Those data,
13 again I know you have cleanup that you need to do with respect
14 to this data, but those data do include at least, I think, and
15 other than MTA attribution, which is a relatively simple
16 process after the fact in terms of attributing a particular MTA
17 ID to a cell site, I mean, effectively, other than the
18 weedouts, trimming out the transiting add ons and some of those
19 other things, it would seem that the outputs from the
20 ReforMaster data would contain absolutely everything that would
21 be needed for this project.

22 A. The difficulty is that on ReforMaster, we read in one
23 transmission because the data that we are reading in came from
24 one switch. It's a single source file. But the output files
25 that we pass to rating and billing are many different files

1 that come out, and the reason is that we do rating and billing
2 for individual what we call in the cellular industry SIDs,
3 S-I-D, system ID, and it's a separate billing entity. So in
4 the case of -- I wish I knew for sure the SID numbers in our
5 area, but if you were to take the Fargo switch, there's
6 multiple individual business billing entities that come out of
7 there and each one of those has their own file. If I was to do
8 the study and I had a choice, even with the exact same data of
9 going to the CDR files or going to the post ReforMaster files,
10 I would choose the input to ReforMaster because there would be
11 fewer files to go after.

12 Q. I'm not sure I get that, but I'm sure if I look at
13 what you just said in the transcript, it will explain it to me.

14 A. Okay.

15 Q. I guess my point in asking that is that it appears at
16 least as though the processing by ReforMaster to winnow down
17 the amount of mass of irrelevant data would result in a data
18 output format that is in fact relatively readily inputted into
19 a relational database and then could be queried with a
20 manageable set of query commands, and without too much trouble
21 you could extract pretty accurate data for the purpose we are
22 talking about here, which is identification of interMTA traffic
23 related to four switches. The queries would be like
24 identifying the four switches, identifying the cell tower
25 locations, and identifying from that where the terminating

1 locations are and then at some point assigning to each of those
2 locations an MTA designation. Then they are either the same or
3 they are not.

4 A. Uh-huh.

5 Q. Does that make sense?

6 A. I hear what you are saying, but the one place that I
7 would differ is I think we are still stuck on this idea it's
8 easier to do the analysis if the data is in a relational
9 database, and I would see no need to transmit the data from
10 like, say, the mainframe platform to a client server platform
11 simply to have the data loaded into a relational database to
12 make the analysis easier. I think by the time you do that
13 additional work, it would not be that -- I would still need to
14 write the programs, like a Nortel version and a Lucent version
15 to do the extracting, because you would want to do that prior
16 to moving to a different platform. And once I have done the
17 extracting, to accumulate the records and do the reporting, I
18 think I could do that accumulation and reporting easier on the
19 mainframe than sending it to a -- transmitting the data, doing
20 the development on a different platform.

21 Q. Yeah, and I can understand that. You want to work
22 with -- I don't know whether a relational database is -- I
23 don't know anything about it. The only thing that occurred to
24 me just in listening to the system explanation is that it
25 seemed to me that the ultimate report that is available to the

1 actual customer online, me if I'm a Western Wireless customer,
2 that I can access, it's a 30-day snapshot so it includes more
3 than the 15 days we have been talking about here. And that
4 pared down data set, which is fairly stripped down, seems to
5 contain the information we are talking about.

6 I think that's my point, is that it looks like there's
7 a relatively cleaned up, stripped down, simple data set that we
8 are now talking about that would be relatively easy to clean up
9 further, because by the time it goes -- correct me if I'm
10 wrong, but it seems like by the time it goes to the customer
11 for billing, the customer isn't going to get a bill that says,
12 you made a call from a cell tower in eastern Pennington County
13 through the Qwest tandem through the SDN tandem and terminated
14 to a rural company's switch or a person in Hartford, South
15 Dakota. It's just going to say you called from this location
16 and it terminated to this number, which is located in Hartford,
17 South Dakota. And that simplicity of data refinement, correct
18 me if I'm wrong, isn't that what we are looking for here?

19 A. Well, that does get you to the file that has the
20 fields that you are looking for as input to the study. You
21 still have to do the report from that, but again, as I've been
22 trying to say, the more complicated part is just the ongoing
23 nature of this study. I think it's quite a bit of work to get
24 to that point. I'm not trying to simplify the process of
25 getting into those files and filtering out what you don't need

1 and getting it summarized, but even after you do all that, by
2 the time you get it done, you are starting to do it again for
3 six months and then you are doing this continually over this
4 three-year life of the contract. I think each time you run it,
5 because of the magnitude and complexity, you need to go back
6 and verify that cell sites haven't changed and trunking hasn't
7 changed.

8 MR. SMITH: Thank you. That's all I have. Any other
9 commissioner questions? Mr. Wieczorek, are you ready?

10 REDIRECT EXAMINATION

11 BY MR. WIECZOREK:

12 Q. Mr. Oliver, as I understand your testimony today, it's
13 possible to do this type of search, but it's just extremely
14 difficult.

15 A. That's right, time consuming maybe would be an equal
16 or better word than difficult.

17 Q. Okay. Talking about the billing, the client database,
18 now, that client database would contain all clients, all
19 subscribers of Alltel?

20 A. It would contain all the subscribers of Alltel that
21 are billed through the V-II wireless billing product, yes.

22 Q. So if you start searching through that and trying to
23 figure out SIDs, you would have to search every client of
24 Alltel to try to eliminate going that route.

25 A. Well, each individual record that would be accumulated

1 for a billing cycle would be like a billing cycle underneath a
2 SID and each of those SIDs would be a separate file to go to.

3 Q. Right.

4 A. They get created daily, but I'm not sure I know where
5 you are going with this.

6 Q. You are not restricted to four switches. If I'm a
7 client of Alltel, I might use the four switches that are part
8 of this study and five more switches if I'm traveling, correct?

9 A. Yes, wherever you are physically located would be the
10 switch that would cover your call.

11 Q. And so if you would do the search once it gets to that
12 database, you are going to be searching more switches than
13 these four trying to figure out how to eliminate calls,
14 correct?

15 A. Well, absolutely, but in reading the testimony, they
16 had always said that it's four switches involved. If it's
17 determined that when you go roaming and those calls that you
18 make could also be eligible for this study, we have just
19 changed the magnitude from looking at four switches on the
20 Alltel network to looking at all 68 switches on the Alltel
21 network.

22 Q. But going back to Mr. Smith's example, your bill
23 doesn't show you what location you made the call, it just shows
24 you that you made a call to a certain number.

25 A. That's right.

1 Q. So if you go to search my database to try to do this
2 in the billing mechanism, you actually search every one of my
3 calls no matter what switch it came off of is where you are
4 going to get stuck.

5 A. I'm sorry, I understand what you are saying now.
6 Absolutely.

7 Q. You are going to be -- you get 128 million calls a
8 day?

9 A. Yes.

10 Q. And figure in you cut that -- to make my math easy,
11 you cut it down to 50 million, you would have to search every
12 subscriber to see if they made a call to one of these ILECs if
13 you get on that back side.

14 A. Right, on the back side you would have to filter out
15 calls that didn't apply to the study just like you are
16 filtering out calls when you do the analysis of the data off
17 the switch, it would be different filtering, but you would have
18 to set up your own filters.

19 Q. Instead of filtering off four switches, you are
20 filtering basically off all your calls to run that down and see
21 which calls you ended up with?

22 A. Correct, you would be filtering from all the complete
23 billable calls.

24 Q. Do you even know -- you are here testifying about some
25 of the things and the way -- the way that the switches work and

1 you have been called as a rebuttal expert for Mr. Musick. Do
2 you know whether Western Wireless had the same type of
3 interface client relational database that Alltel has?

4 A. Help me clarify when you say interface relational.

5 Q. The post ReforMaster, the separate thing that the
6 client interchange would have, do you know whether WWC even had
7 that?

8 A. Well, perhaps I don't understand the question, but
9 that part, they farmed that out to a third-party vendor. The
10 AMDOCS product would take care of it. So the Western Wireless
11 people wouldn't have direct access to like, say, the code or
12 the data that was in AMDOCS.

13 Q. Is it your understanding from -- this goes back to Mr.
14 Smith's questions, these questions revolving around how Alltel
15 Atlanta office handles this. This would have been information
16 WWC wouldn't have had access to at the time they were trying to
17 do this study.

18 A. Correct. I was answering those questions based on
19 Exhibit No. 22 that shows how Alltel is set up, the ReforMaster
20 and our mainframe and rating. I don't think they had -- I'm
21 quite sure they would not have been able to get that same
22 information out of AMDOCS because that would have been a
23 proprietary format.

24 Q. There was a question that you responded to Ms. Wiest
25 where you said pulling this information is fairly simple, but

1 is it time consuming?

2 A. Well, every time you do the study -- you know, from my
3 point of view, the things that take time are trying to get
4 answers to questions when you don't have somebody at the other
5 end of the e-mail that always knows the answer to the questions
6 you gotta ask. The questions that come up in designing -- we
7 are trying to supply data to a consortium of companies and
8 there's going to be questions that come up that need consensus
9 from a body, and it makes it difficult to get the project
10 specked out and it's just another factor that makes the project
11 take more time.

12 Q. And I believe when she asked about just pull the
13 records off, you said that's fairly simple to pull the records,
14 but does that take time just to pull the records off of your
15 backup switches?

16 A. Yes, like it would take, you know, a few days probably
17 to identify, set up the jobs, pull the data down, and since you
18 don't pull it all down at once, you are just keeping track of
19 what data you have processed to make sure that you don't have
20 any gaps and that you have the complete volume of calls from
21 the four switches for the 15 days.

22 Q. And even before doing that, you would have to write a
23 program to -- for both the Nortel and the Lucent switch to pull
24 the correct NPA-NXXs, correct?

25 A. That's right, because the difference in the layout

1 between the two switches, based -- they are variable length
2 records and based on the code fields in the beginning of
3 Lucent, the records are different length and the fields are
4 actually located in different positions based on like if you
5 have an incoming call to cell site is a different location than
6 if it's an outgoing call. I don't know why they do that,
7 probably to make my life difficult. It adds to the complexity,
8 so you would need a separate program for Nortel, a separate
9 program for Lucent.

10 Q. There was some questions on porting. If the ILEC does
11 porting, if you were to assume an ILEC was doing porting, is
12 there any way that you can even figure out how to determine
13 whether this call was ultimately delivered to the ILEC using
14 the CDR analysis?

15 A. I think it would be impossible because what would
16 happen is the call record would only tell me the number that
17 was dialed and if that number that was dialed no longer belongs
18 to the ILEC because the person had ported to a different ILEC,
19 short of getting a daily update that tells me which dialed
20 numbers belong to which companies across the United States, I
21 don't think there would be any way you could accurately do this
22 type of study with landline porting in place.

23 MR. WIECZOREK: That's all I have.

24 MR. SMITH: Do you have any follow-up, Ms. Rogers, in
25 response to at least the commissioners and my questions?

1 MS. ROGERS: Yes, thank you, I have just a few and I
2 apologize if my notes aren't as organized as I would like them
3 to be.

4 RECROSS-EXAMINATION

5 BY MS. ROGERS:

6 Q. In response to I'm not sure if it was Ms. Wiest or
7 Commissioner Johnson, you were responding to interpretations or
8 assumptions that would need to be made in arriving at a study.
9 I'm going to assume, and correct me if I'm wrong, but I believe
10 you testified earlier that you have not read the contract or
11 the agreement that's between the parties.

12 A. That's correct.

13 Q. So your response to those questions would be aside
14 from anything that is defined within the agreement, any of
15 those things that would require interpretations or assumptions;
16 is that correct?

17 A. I don't imagine the contract gets to the level of
18 detail of the type of question I would have, but I would say
19 your statement was correct.

20 Q. Just as an example, with regard to conversation time,
21 if conversation time is defined in the contract, then that
22 would control what is meant by conversation time and there
23 wouldn't be any interpretation that would be necessary for
24 that; is that correct?

25 A. That's correct.

1 Q. And as another example, if the contract dictates that
2 the tower location is the start of the call, then that would be
3 controlling and there wouldn't need to be any tweaking, the
4 tweaking that you were talking about at the cell sites; is that
5 correct?

6 A. That's correct.

7 Q. You responded to some questions concerning how long it
8 would take to run a program on the mainframe or get the
9 information off the mainframe, and I'm not sure that I ever
10 heard your response, so I'll ask you this. How long would the
11 program that we are talking about take to run off the mainframe
12 in your diagram?

13 A. The actual running of the program time compared to the
14 length of the entire project is a small amount, like the
15 actual -- to read in a million records and filter them, the
16 actual program from start to finish running would probably be
17 like 15 or 20 minutes maybe.

18 Q. Thank you. That helps me quantify it. Would WWC have
19 access to the raw CDRs?

20 A. Yes. Maybe I should quantify that. They have access
21 to the raw CDRs but they didn't have a storage tool that would
22 let them directly access historically. When they had to
23 collect CDRs for their study, I believe they intercepted the
24 daily feed and built their historical database from that point
25 forward. So they were intercepting the calls between, in their

1 case, say, then their call collector and their ReforMaster
2 product.

3 Q. So they wouldn't have taken them from the thing
4 that's -- the archives that's on the right-hand side of your
5 diagram, to your knowledge?

6 A. To my knowledge, no, I didn't see any reference in
7 them requesting archived data from AMDOCS.

8 Q. But nevertheless, they would have access to the raw
9 AMA records or the raw CDRs.

10 A. Yeah, they would have access I guess to go back the 90
11 days. I'm not exactly sure what they would have to do as far
12 as who was the keeper of the data and what they would have to
13 do to access that data, but if, say, they had it for 90 days,
14 that assumes they had access for 90 days.

15 Q. Do you understand how the AMDOCS system is designed?

16 A. No, I do not.

17 Q. Do you understand the LNP and the JIP, J-I-P?

18 A. I understand LNP concepts, but not the JIP. My
19 coworker understands that part of it better than I do.

20 Q. Do you know where the 411 directory assistance center
21 is for WWC?

22 A. No, I do not.

23 Q. Do you know if WWC completes the calls over IXC trunks
24 or does it route the calls back to the wireless switch?

25 A. I don't know.

1 Q. You stated that you felt the biggest difference
2 between landline and wireless as far as what's available from
3 the switch is LNP. Isn't it true that there are some landline
4 networks that implement LNP?

5 A. That is true that some do.

6 Q. So then that difference would not be the biggest
7 difference there, would it, in those cases?

8 A. No, that's correct, if you eliminate that difference,
9 there would be other differences to worry about.

10 Q. If you give me just a second here, please.

11 A. Sure.

12 Q. In response to some questions by Mr. Wieczorek, you
13 were talking about the calls from different switches, not just
14 the four that we have been talking about in this context, but
15 since Alltel's other switches are not interconnected, would you
16 agree with me that once a person traverses beyond the area
17 served by those switches, that these calls would be handled by
18 an IXC and not part of the study?

19 MR. WIECZOREK: I object as the question is vague. My
20 question dealt with doing a search post billing. She's
21 assuming my question dealt with a prebilling raw data search,
22 so the question is vague if she doesn't tell which area that
23 he's supposed to answer that in regards to.

24 MR. SMITH: Is that something you can clarify?

25 MS. ROGERS: I think so, just a minute.

1 Q. (BY MS. ROGERS) With regard to the study that we have
2 been talking about today, would that not just include reports
3 from four originating switches, i.e., Fargo, Rapid City, Sioux
4 Falls, and Grand Island?

5 MR. WIECZOREK: I'm going to object again because we
6 have talked about doing the study a couple different ways now.
7 Mr. Smith brought up a whole new way, and I think -- the reason
8 I'm objecting is I am not trying to be obstinate here, but my
9 line of questioning dealt with what Mr. Smith was talking about
10 in that you would have a whole bunch of other switch
11 information included post billing you wouldn't have pulling
12 them directly from doing a preswitch, so it has to do with the
13 amount of searches. So I'm not trying to be confusing, but I
14 think it's only fair that we recognize that my questions dealt
15 with a whole different search pattern than the one that Mr.
16 Wilson attempted.

17 MR. COIT: If I could respond to that, I think,
18 though, that the answer given would imply that somehow the data
19 would be affected by looking at different numbers of switches,
20 and I think given that implication, I think these questions are
21 appropriate.

22 MR. SMITH: I forgot what you asked him now, Darla.
23 Is what you are asking him, are all of the calls at issue, do
24 the calls at issue route through those four switches, is that
25 what we are asking him? Maybe he knows or doesn't know.

1 Q. (BY MS. ROGERS) Yes, my question is, when we are
2 talking about a study for purposes of like a CDR study or an
3 interMTA traffic study, aren't we talking about calls from four
4 originating switches, those are the four that I just named?

5 A. If you define the --

6 VICE-CHAIR JOHNSON: Mr. Smith, did you rule on the
7 objection?

8 MR. SMITH: No, because I asked another question. I
9 guess what I'm trying to do is say, can you phrase the question
10 in a way that gets at it without the objectionable features Mr.
11 Wieczorek brought up. I think if the question is simplified
12 and asked in a few parts, that can happen. It's sustained, but
13 please proceed to do it that way, if you could.

14 MS. ROGERS: I'll maybe just move on here. I think
15 that's all I have, thank you.

16 MR. COIT: May I ask a few?

17 MR. SMITH: Please.

18 RECROSS-EXAMINATION

19 BY MR. COIT:

20 Q. Going to the questions that we kind of got into, maybe
21 I can ask these in a different way. The four switches that we
22 have been talking about, was there -- which I believe are the
23 Fargo, Rapid City, Sioux Falls, and Grand Island switches, are
24 those -- first, are those the four switches that we are talking
25 about, to your knowledge?

1 A. Well, the problem is that the Grand Island switch was
2 divested and is no longer part of Alltel.

3 Q. Okay, so --

4 A. So I think you are down to three.

5 Q. Down to three.

6 A. Fargo, Sioux Falls, and Rapid City, yes.

7 Q. Why would those three switches have been part of this
8 interMTA traffic study? Was there any particular reason it
9 would have been those three, to your knowledge?

10 A. Because the current network had -- as I understand it,
11 the current network had IMT trunks that was the basis for the
12 topic we are discussing today.

13 Q. So they were connected, basically those -- traffic
14 between those switches was exchanged without ever hitting an
15 IXC's network, correct?

16 A. Correct.

17 Q. Do you know whether Bismarck was a part of any of
18 those studies?

19 A. Bismarck and Fargo are two switches that are combined
20 under one transmission of CDRs. When the study was taking
21 place, they were what they call 5 ESS, like two different
22 Lucent boxes, but now just within the last two weeks, they were
23 combined into a single 5 ESS switch, and I guess my point of
24 bringing that up is that we are constantly making changes to
25 our network and although today there's three switches involved,

1 when you looked at this months ago, there were four switches
2 involved. I don't know that sometime in the future the
3 engineering people will decide to IMT other trunks into the
4 network or not. That's a business decision where they make it
5 and I'm not necessarily privy to the answer.

6 Q. Okay, the Bismarck and Fargo, though, do you know, are
7 those in one MTA or two different MTAs?

8 A. I do not know.

9 Q. With respect to Fargo, Rapid City, and Sioux Falls, do
10 you know whether they are in different MTAs?

11 A. I do not know. Actually, on that one I would say that
12 they are because I know there's multiple MTAs and we have only
13 these three switches, so by default there must be multiple MTAs
14 across the three switches.

15 Q. If you study beyond these switches that are
16 interconnected, these particular four switches, I think the
17 question is, with respect to traffic that may be going to the
18 NPA-NXXs in the MTAs in South Dakota that we have been looking
19 at here, other than traffic that is routed in between these
20 various switches, in order for that traffic from these other
21 switches to get here, doesn't that traffic have to traverse an
22 interexchange carrier?

23 A. To do the study with a snapshot on how we are set up
24 today, yes, but again, we have three switches today, six months
25 ago we had four, and for the study that's going to revolve over

1 time, every six months, I will have to make sure that we
2 re-examine our network before we do the study each time.

3 Q. You had made a reference in response to some questions
4 about the originating call data not including the location of
5 the caller or called party. You understand, though, that under
6 the current contract, the parties actually agree that the
7 originating cell site would be the point of origination or the
8 originating end office.

9 A. That's correct, but if -- I believe that question was
10 that you couldn't determine the terminating point with LNP or
11 am I thinking of a different point of testimony?

12 Q. I think Mr. Wieczorek asked you the question. There
13 was a question about determining the originating location and
14 that particular data not being part of records that flow
15 through to the ReforMaster or the mainframe. Have I got that
16 right?

17 A. I'm not sure.

18 MR. WIECZOREK: I'm going to object and say no, he
19 doesn't.

20 MR. COIT: What was the question? Because I recall a
21 question along the lines of originating location data not
22 flowing through into the ReforMaster. Was I wrong?

23 MR. WIECZOREK: I believe that question had to do with
24 Mr. Smith's example of using a post billing. Mr. Smith had
25 said that the client gets the location on his bill and I

1 said -- I asked him whether the location appears on a client's
2 bill and that information, no, you just give originating and
3 terminating number when it gets to the bill stage. And to the
4 extent -- I'm jumping in here and I apologize, Rich, but he was
5 designated to respond to Mr. Musick saying that this was easy
6 under this format, and we are getting him to a stage where now
7 we are cross-examing on how would you do this study and maybe
8 there's better ways for Alltel. I would like at least to make
9 an objection to the extent the questions keep going to this how
10 would you do this study today kind of thing, because he was
11 never nominated for that and we are actually -- I'm starting to
12 feel like we are starting to litigate a new case for a new
13 contract.

14 MR. COIT: That really wasn't my question.

15 MR. SMITH: We have done that several times so far and
16 we might as well handle the arbitrations while we are here
17 today. I'm sorry. I'm sorry, Rich, but I think I'm going to
18 sustain the objection that was now made about four minutes ago.
19 Because I do think that misstates the question that was asked
20 and answered.

21 MR. COIT: Then one follow-up.

22 Q. (BY MR. COIT) Did you not testify that the
23 originating cell site location data would be data that would be
24 part of the data that flows through to the mainframe?

25 A. That's correct. It would be the cell site number, it

1 wouldn't be the MTA, though.

2 Q. It would be the cell site number?

3 A. The cell site number gets passed to billing. It
4 doesn't appear on the subscriber's bill, but it's in the file
5 in the background.

6 Q. You had testified about some switches in Idaho and
7 there being a dropoff of I believe 90 percent. Could you
8 clarify what you were talking about there?

9 A. Certainly. We recently acquired two additional
10 switches in Idaho, Twin Falls and Pocatello, and -- I want to
11 make sure I figure out which one is which. Perhaps it's not
12 that important, but I'm going to say it's the Pocatello switch
13 has an older technology, it's called TDMA, kind of I guess you
14 could call it analogue phones, and the new switch that was
15 added was a CDMA switch and it covers the digital traffic.
16 However, the way that the two switches are networked, if you
17 are on a CDMA digital phone and you get picked up by a cell
18 tower that's connected to the analogue switch, it generates an
19 additional caller record from Twin Falls over to Pocatello to
20 continue the routing to where it's going. So the one call ends
21 up making two CDRs through the life of the phone call and since
22 most of our subscribers are now digital, the volume of the
23 calls that get dropped that are being passed from the analogue
24 switch to the digital switch forces us to drop close to 90
25 percent of the calls coming off Twin Falls.

1 MR. COIT: Thank you, I have no further questions.

2 MR. SMITH: Any staff follow-up?

3 MS. WIEST: No.

4 MR. SMITH: Commissioner.

5 VICE-CHAIR JOHNSON: No, sir.

6 MR. SMITH: You are excused, Mr. Oliver. Did you have
7 any last follow-up questions, Tal?

8 MR. WIECZOREK: No.

9 MR. SMITH: You may step down. Thank you very much.
10 Okay, Ms. Rogers, do you intend to call a rebuttal witness? Do
11 you want to take a short break?

12 MS. ROGERS: Yes, please.

13 MR. SMITH: Again we gotta be cognizant of Carla's
14 needs here. Thank you.

15 (Brief pause.)

16 MR. SMITH: We are back in session following a short
17 recess. Ms. Rogers, please proceed.

18 MS. ROGERS: We have decided not to call Mr. Musick to
19 the stand, so I believe we are through with the evidentiary
20 portion of this hearing.

21 MR. SMITH: Thank you. I think what we are going to
22 do now is take a recess and the commissioners and I, they had a
23 chance to do some consultation regarding your outstanding
24 motion, but we didn't quite -- in order not to be totally rude,
25 we suspended that and maybe we will take a short recess. Can

1 you handle a 15-minute recess, Carla? We will be ten minutes
2 after that. Is that okay?

3 (Whereupon, the hearing was in recess at 2:45 p.m.,
4 and subsequently reconvened at 3:00 p.m., and the following
5 proceedings were had and entered of record:)

6 MR. SMITH: Following our short recess, we are back on
7 the record, and at this time the commissioners, are you going
8 to take up the issue of the pending motion by Western Wireless
9 to allow the admission of a substituted exhibit for Exhibit --
10 what was the number, Tal?

11 MR. WIECZOREK: It would be, if it was numbered as a
12 new exhibit, it would be 23. If it's numbered as a
13 replacement, I believe it replaces 21. I'll double check that
14 number for you. Yes, 21.

15 COMMISSIONER HANSON: The new one would be 23?

16 MR. WIECZOREK: If there was -- Mr. Smith had said
17 that perhaps what you would do is number it in as a separate
18 exhibit and we marked 22 today, so that would be marked as 23.
19 If it was a replacement, it was a replacement for 21.

20 MR. SMITH: 21 was the original spread sheet that Mr.
21 Williams testified regarding.

22 COMMISSIONER HANSON: So the substitute would be 23?

23 MR. SMITH: Exactly, although if you went that route,
24 it really wouldn't be a substitute, it would be an additional
25 exhibit that you would be allowing in to conform to that other

1 interpretation of the contract that Mr. Wieczorek has now
2 interjected into the case.

3 COMMISSIONER HANSON: Thank you. I move to deny
4 Western Wireless's motion to admit the substitute or additional
5 Exhibit No. 23.

6 VICE-CHAIR JOHNSON: I'll second the motion.

7 MR. SMITH: Motion carries. The motion to admit
8 substitute exhibit is denied. I believe is there any other
9 matter to come before the commission? Are we going to set a
10 briefing schedule now? Do you want to do that or do you want
11 to do it via e-mail after we get the details on the transcript,
12 et cetera?

13 MS. WIEST: We have already worked one out.

14 MR. SMITH: Fire away. Why don't we put it on the
15 record and the commission can vote on it.

16 MS. WIEST: Everybody correct me if I'm wrong.
17 September 5th Western Wireless will submit their initial brief.
18 September 29th, that would be briefs by Golden West and the
19 intervenor, SDTA. And then October 10th, that would be staff.
20 October 18th, Western Wireless --

21 MR. WIECZOREK: 10th would be staff, 16th would be --

22 MS. WIEST: October 10th is staff and then October
23 16th would be Western Wireless's responsive brief.

24 MR. WIECZOREK: Yeah.

25 MS. WIEST: It's a little bit more complicated than

1 that because we have counterclaims and those kind of things,
2 but that will all be discussed in the briefs. October 30th
3 will be the reply by Golden West and SDTA.

4 MR. WIECZOREK: And just if I could supplement Ms.
5 Wiest, I think there's agreement on the dates. We met while
6 the commission was in recess. My initial brief would deal with
7 my complaint issues. Ms. Rogers would then do her affirmative
8 defenses and respond to my complaint and do her complaint in
9 her initial brief and then I would get response to her
10 complaint and rebuttal on my issues in my next brief. Her
11 final brief then would be rebuttal brief on her issues alone
12 and not on the original complaint.

13 MR. SMITH: Is that agreeable to Golden West and to
14 SDTA?

15 MS. ROGERS: Yes.

16 MR. COIT: Yes.

17 MR. SMITH: And to staff.

18 MS. WIEST: Yes.

19 MR. SMITH: Thank you. Do the commissioners feel you
20 need to take action on it or should we accept that as a
21 stipulation?

22 VICE-CHAIR JOHNSON: If it would clean up the record,
23 I can move to accept that.

24 MR. SMITH: Why don't you.

25 VICE-CHAIR JOHNSON: I make that motion.

1 COMMISSIONER HANSON: I second.

2 MR. SMITH: Okay, and we will hopefully get an order
3 out here, it may not be this week, unless Rolayne writes it.
4 Okay, thank you. The hearing is adjourned.

5 (Whereupon, the proceedings were concluded at 3:05
6 p.m.)

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C E R T I F I C A T E

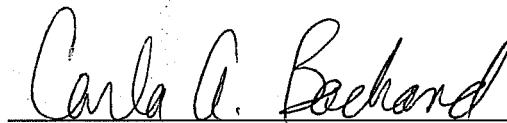
STATE OF SOUTH DAKOTA)
) ss.
COUNTY OF HUGHES)

I, Carla A. Bachand, RMR, CRR, Freelance Court
Reporter for the State of South Dakota, residing in Pierre,
South Dakota, do hereby certify:

That I was duly authorized to and did report the
testimony and evidence in the above-entitled cause;

I further certify that the foregoing pages of this
transcript represents a true and accurate transcription of my
stenotype notes.

IN WITNESS WHEREOF, I have hereunto set my hand on
this the 9th day of August 2006.



Carla A. Bachand, RMR, CRR
Freelance Court Reporter
Notary Public, State of South Dakota
Residing in Pierre, South Dakota.

My commission expires: June 10, 2012.